

# **Anti-corruption reform and political will in Papua New Guinea**

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## Executive summary

The PNG government has recognised the importance of responding to corruption through a variety of fora. This includes Prime Minister James Marape (2024) calling for more robust responses. As a result, over the past few years, PNG has seen numerous anti-corruption reforms take place. Since 2019, the government has introduced new whistle-blower legislation; expanded the Ombudsman Commission's jurisdiction; held a commission of inquiry into the controversial Union Bank of Switzerland (UBS) deal (with the report recently tabled in parliament) and a parliamentary committee into corruption in the health sector; has released plans and strategies to combat corruption; and has established a new Independent Commission Against Corruption (ICAC). Though rare, there have been some judicial responses to corruption and occasional arrests (PNG ICAC, 2024). However, the effectiveness of these reforms is still being tested.

This report sheds light on the nature of political will towards anti-corruption reform in PNG, through a rapid political economy analysis approach, with a view to informing and improving policy responses. To do so, it draws on interviews with 27 experts involved in anti-corruption reform and delivery in PNG; it also provides an analysis of budget documents along with the academic and policy literature. The report takes readers through wide-ranging discussions about the potential for supporting anti-corruption reforms and highlights what key stakeholders could do to respond to the challenges associated with addressing corruption in the country.

The analysis leads to nine key recommendations, namely that:

1. Given the expectations and goodwill towards PNG's ICAC, policy makers should prioritise their support for this newly established anti-corruption agency. This will mean focusing on securing dependable long-term funding, developing broader support across civil society and the community, and improving relationships with other agencies. Equally important is the establishment of robust internal governance frameworks along with measures to ensure proper oversight of this increasingly important institution.
2. Other key anti-corruption legislation should be introduced; in particular, the Whistleblower Act (2020) needs to be amended, and a freedom of information law introduced.
3. Policy makers should work to improve the accountability of subnational reforms; this should include focusing on improving district administration.
4. Government and donors should also support civil society, particularly the churches, in their anti-corruption advocacy and educational efforts.
5. Western donors should better support efforts to address transnational corruption and respond to the challenges of greater geopolitical competition.
6. Policy makers should identify political champions and support long-term electoral reforms.
7. Researchers and practitioners should explore the potential for unique Papua New Guinean responses to aid anti-corruption efforts.
8. Policy makers should focus on anti-corruption awareness raising and advocacy that highlights the way corruption impacts local communities and improves educational outcomes.
9. Policy makers should focus on providing training that supports long-term learning.

# 1. Introduction

There have been many attempts to address corruption in Papua New Guinea since independence; however, the past few years have seen the most significant anti-corruption reforms in the nation's history. Since 2019, under the Marape-led government, there has been the establishment of a commission of inquiry into the controversial UBS deal (Inja and White, 2022) (with the resultant report recently tabled in parliament), a parliamentary committee into corruption in the health sector, whistle-blower legislation passed, plans to address corruption released (Government of Papua New Guinea 2020), and the establishment of the new Independent Commission Against Corruption (ICAC). The United Nations has assessed the country's framework to prevent and compact corruption as "relatively comprehensive" (2024: 10), and notes that further initiatives to address corruption – including the development of an inter-agency working group, the appointment of ICAC's oversight committee and Memorandum of Agreements between integrity agencies – are in progress. These developments suggest the Government might be ushering in a new era of anti-corruption reform.

However, in considering the potential for effectiveness it is important to reflect on previous anti-corruption efforts. There have been many advances in anti-corruption efforts since independence; indeed, the country's Ombudsman Commission is enshrined in PNG's Constitution. Still, there have been challenges. For example, PNG's previous anti-corruption watchdog, Investigation Taskforce Sweep (2011-2014), was initially successful in investigating and helping to prosecute corruption cases but was ultimately de-funded after it initiated an investigation into the then Prime Minister, Peter O'Neill. Budgetary analysis featured in this report shows that while the Marape-led government has undertaken some important anti-corruption reforms, over the past 15 years PNG governments have under-funded key integrity and anti-corruption organisations.

The newly established ICAC – established the agency after significant pressure from the International Monetary Fund – provides a ray of hope for some, but progress has been slow. Its first arrest in March 2025 (Kalinoe, 2025), five years after its 2020 enabling law, marked a cautious step forward. However, allegations of corruption, infighting, and abuse of powers among the three commissioners led to their suspension and the appointment of acting replacements (Faa, 2025).

Moreover, some highlight the significant challenges faced by anti-corruption efforts in a country whose population are mostly located in rural and remote locations, rely upon informal systems of reciprocity (i.e. the *wantok* system) and face significant economic challenges. Some believe corruption is widespread. The 2024 United Nations Country Analysis which argues that corruption is "deeply entrenched" and "poses a significant barrier to effective governance, eroding public trust and institutional integrity" (UN PNG, 2024: 4). One academic has suggested that corruption now has become a way of life for many of the country's citizens (Winn, 2021). These challenges invite despair for some, with opposition MP Allan Bird recently claiming that the high levels of corruption in the country are one indicator of PNG being a "failing state" (Bird, 2024).

Despite such assessments, this report argues that there are reasons for hope. As it documents, while there are many examples of anti-corruption failures, there are also enough anti-corruption success stories to suggest change is possible. Public officials, members of

civil society, donors and ordinary Papua New Guineans have and continue to fight against corruption in a variety of ways; this includes communities directly sanctioning – sometimes with force – those they believe to be corrupt (Walton, 2018, 2013).

This report argues that the next steps for refining and implementing recent anti-corruption reforms require even greater political will – i.e. committed support among key anti-corruption and political stakeholders (see Post, et al. 2010). This is because, as highlighted in other contexts (Batory 2012; Quah 2017; Schnell 2018), generating political will amongst key groups is critical – alongside other broader reforms such as universal education - for implementing meaningful reforms to curb corruption. However, this report shows that efforts to build political will need to be tailored to the challenges and opportunities facing PNG. And that building effective responses against corruption take time, patience, and significant resources. While there is a role of donors and other external stakeholders, given its complex political economy, much of the change we outline will need to come from within PNG.

Drawing on interviews with key stakeholders involved in anti-corruption reform in the country, along with an analysis of academic and policy literature, this report provides key insights into perceptions about the nature of and potential for building political will towards anti-corruption reform in Papua New Guinea. The project aims to better understand how political will towards anti-corruption reform in PNG might be improved, with a view to informing policy responses.

To do so, the report first provides a background on corruption and anti-corruption reform in the country. It then explains the methodology and examines key findings from interviews undertaken in Papua New Guinea and Australia. The final two sections discuss key findings and provide recommendations along with concluding remarks.

## 2. Corruption and anti-corruption reform in PNG

Papua New Guineans have, for a long time and in various ways, sought to address corruption. In the lead up to independence, the Constitutional Planning Committee's (1974) report identified corruption as a key risk to this new nation and recommended the establishment of a Leadership Code and Ombudsman Commission, which were subsequently established into the nation's constitution despite misgivings from some political elites, such as from the country's inaugural Treasurer Sir Julius Chan (2016).

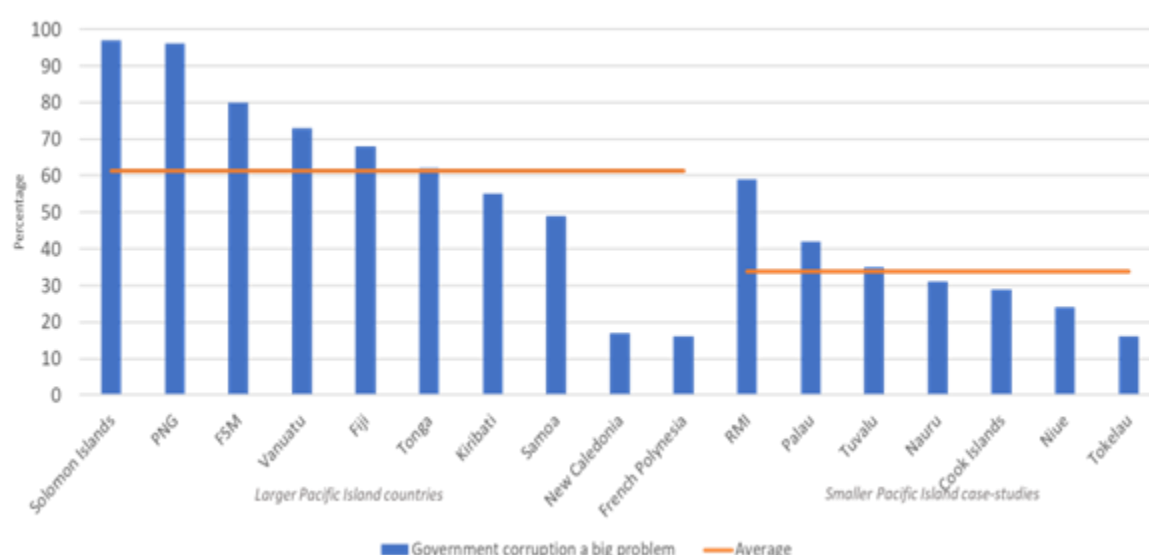
While independence in 1975 up until the mid-1980s was a period considered by many as featuring a robust public administration that helped to keep corruption under control, by the mid- to late 1980s, corruption and nepotism had begun to run rampant, despite the efforts of the country's integrity institutions (Clifford, 1984; May, 2004; Peiper, 2004). May (2004) for instance has argued that corruption and nepotism became particularly noticeable in the 1990s and before then, whilst apparent, he believed was less of a direct threat to the government. Since then, concern about corruption in the country has only increased.

As a result, citizen surveys have highlighted high levels of concern about corruption and the lack of effective response to it. This is highlighted in the most recent large-scale survey conducted in the country: Transparency International's Global Corruption Barometer (GCB). Conducted in 2021, the global survey was, for the first time, undertaken across 17 Pacific

Island nations (Transparency International, 2021 and 2022)<sup>1</sup>. The findings highlight the high levels of concern about corruption from Papua New Guinean citizens, compared to respondents in other Pacific Island countries.

As Figure 1 shows, more respondents from PNG along with Solomon Islands, expressed concern that corruption is a big problem in government compared to other countries in the region. This result was essentially replicated when asked about corruption in the private sector, with 90% of respondents from Solomon Islands and 82% from PNG saying that corruption is a problem in that sector (Transparency International 2021)<sup>2</sup>. This is likely due to weak government administrative systems and the concentration of high-risk industries – particularly logging and, in PNG, mining.

**Figure 2: Percentage Global Corruption Barometer respondents who said government corruption is a big problem\***



\*Compiled from Transparency International (2021 and 2022)

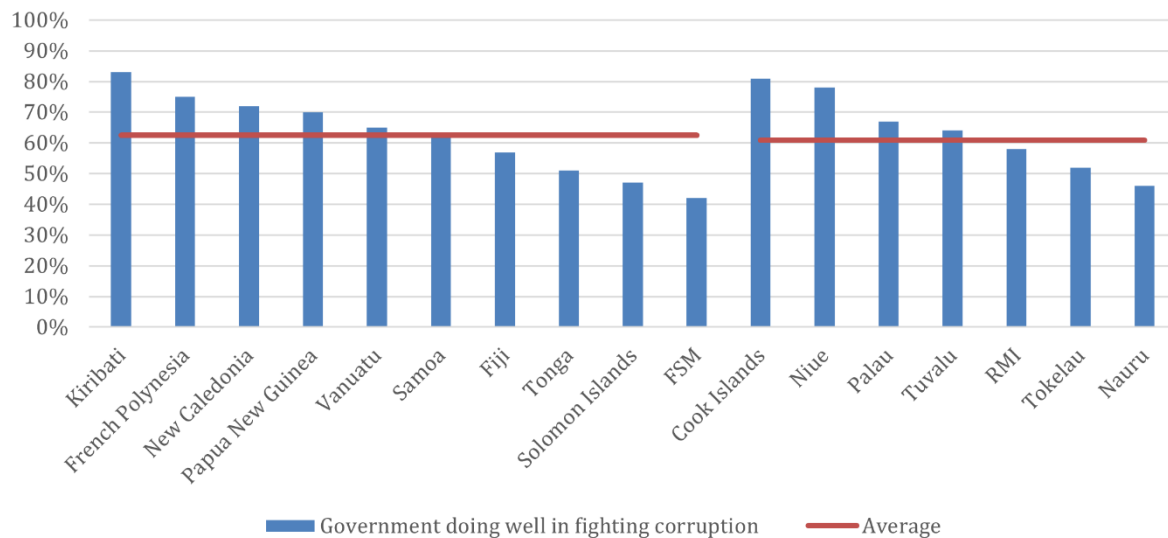
Results from the GCB also suggest that few believed that corrupt officials were punished. Only twenty-seven percent of respondents from PNG said they believed officials engaging in corruption frequently face action against them (Transparency International 2021). Despite this, 70% said that the government was doing well<sup>3</sup> in the fight against corruption (See Figure 2 below). This result might suggest that the steps taken by the government to address corruption are looked upon favourably by citizens (although further research is required to test this hypothesis).

<sup>1</sup> The survey interviewed a total of 7,366 people by phone in 2021 (out of these 1,025 were from PNG). Respondents were asked 37 close-ended questions on their perceptions, experiences, and attitudes towards corruption and anti-corruption reforms and action.

<sup>2</sup> The questions about levels of corruption in the private and public sectors asked: "How much of a problem, if at all, is corruption in a. the government in [country]; b. the business sector in [country]."

<sup>3</sup> The relevant question was: "How well or badly would you say the current government is handling fighting corruption in the government or haven't you heard enough to say?"

**Figure 3: Percentage Global Corruption Barometer respondents who said government was doing well in fighting corruption**

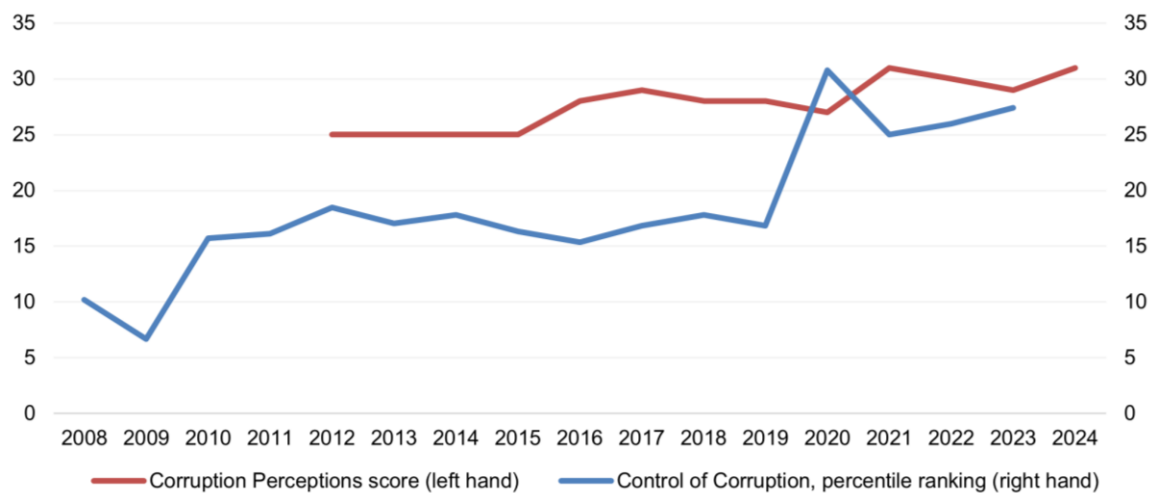


\*Compiled from Transparency International (2021 and 2022)

While concern about corruption is significant, some external assessments show that efforts to address it might be having an impact – at least on external perceptions. Figure 3 shows PNG’s perceived levels of corruption and control of corruption by Transparency International’s Corruption Perceptions Index (CPI) and the Worldwide Governance Indicator’s ‘Control of Corruption’ respectively. It shows some improvement in these measures, albeit to a small degree in terms of the country’s CPI score. The country scored 27 out of 100 on the CPI in 2020 which rose to 29 out of 100 in 2023 (with 0 equating to very corrupt and 100 clean). After improvements between 2019 and 2020, the country’s control of corruption percentile ranking declined from 31 in 2020 down to 26 out of 100 in 2022. However, it is important to keep in mind that these indicators rely on expert external assessments of the level of corruption in the country, and do not necessarily correlate to actual corruption, which is conducted in secret and thus cannot be accurately measured. These measures therefore represent the level of concern about corruption, rather than their prevalence per se.



**Figure 3: Comparison of PNG's Control of Corruption and CPI score\***



\*Calculations: Husnia Hushang and Grant Walton

Indeed, policy makers need to be careful in interpreting such measurements as perceptions about corruption in PNG are shaped by the country's social, cultural and economic milieu. For example, Tiki and colleagues (2021) research with PNG public servants working across three departments also showed that perceptions of bribery were influenced by both traditional and organisational cultural norms. Large scale citizen surveys have also shown that marginalised groups tend to define corruption in more localised and moralistic ways than enfranchised groups (Walton, 2015). Drawing on a study of over 1800 people across nine provinces, Walton (2015) shows that women and those in more rural communities are more likely to agree that corruption involves local people doing the wrong thing (such as drinking alcohol and selling sex) than potentially large-scale corruption involving politicians. This means that marginalised groups are less likely to be concerned with corruption involving the state, and even less concerned about corruption that they do not believe directly impacts on their communities.

In turn, what some outsiders might call 'corruption' as defined as 'the abuse of public office for private gain', a popular definition used by governments and donors, is not always reflected by Papua New Guineans themselves. Moreover, many marginalised Papua New Guineans are willing to support elites that distribute state resources gained by corrupt means. This is highlighted by focus groups in rural areas across four provinces. This research shows that poor and marginalised communities can justify engaging in corruption (such as taking money in return for their vote) because of their strongly felt connections to powerful political patrons and the fact that the state fails to provide development at other times of the year (Walton, 2013).

Researchers have additionally shown that citizens say they are more willing to report corruption under certain circumstances. Drawing on the nine-province survey mentioned above, Walton and Pieffer (2017) have shown that formal education and the strength of integrity systems are key factors in determining citizens willingness to report corruption. That is, those with higher levels of education (beyond primary schooling) and greater faith that something that will be done about corruption were more likely to say they were willing to

report. Research conducted in Port Moresby has shown that citizens are even more likely to report if anti-corruption messages stress the impact that corruption has on their communities and *wantoks* (Peiffer and Walton 2022).

Walton's (2013b) qualitative research found in rural and remote communities many citizens resist activities that they deem corrupt. For example, many respondents in focus groups said they would respond violently to a scenario involving a teacher stealing office supplies from a school in their community. One respondent from Southern Highlands province said, "we'll beat up anyone who does this in our place" (Walton, 2013b: 185). In turn, while corruption in PNG is seen by many as widespread and systemic, there's increasing evidence that Papua New Guineans will rally against what they deem corrupt given the right circumstances.

## 2.1 Integrity and enforcement agencies and political will

Within this context, the state's integrity and enforcement agencies have battled to fight corruption. This sub-section provides an overview (see Box 1 below), resources for and an assessment of effectiveness of the country's key integrity and enforcement agencies.

PNG has numerous laws, regulations and institutions aimed at addressing corruption, with the UN's Implementation Review Group's 2013 assessment finding that the country has demonstrated "an inclusive approach to fighting corruption" (UN 2013: 6), and since this time the government has made progress in addressing some of the recommendations from this review, particularly through the implementation of an ICAC. The country has also recently addressed one of the assessments key concerns – the resourcing of integrity agencies.

Figure 4 shows the total spending on (that is how much these agencies have reportedly received) and allocations for four of the country's key integrity and enforcement agencies (see Box 1 for further information about these and other integrity agencies):

- (i) Ombudsman Commission (which was established in the constitution to guard against the abuse of power by public servants and politicians; leaders found to be abusing their position are referred to the Leadership Code Tribunal),
- (ii) the National Fraud and Anti-Corruption Directorate (referred to as the National Fraud Squad in this report, which is a part of PNG's police force that investigates corruption)
- (iii) Auditor-General's Office (the state's supreme audit body) and both Investigation Taskforce Sweep (PNG's intergovernmental anti-corruption multi-agency taskforce that operated from 2011 to 2014)
- (iv) Independent Commission Against Corruption (ICAC; the country's first anti-corruption agency enshrined in the constitution; it is worth noting that the ICAC also has an enforcement arm).

Figure 4 shows significant budgeted increases of funding for three of these agencies: in real 2023 figures, by 2024 the ICAC's funding is budgeted to rise to 45 million kina (although in Section 4 one respondent notes that the ICAC thus far only received two-thirds of this allocation). While the Ombudsman Commission got a budgeted bump of almost 10 million kina, with funding now at 41million kina per year. The Auditor General's department also got a budgeted bump, with its funding rising to 26 million kina; the National Fraud Squad missed out on an increase in the 2024 budget, with an allocation of 3.7 million kina.

## Box 1: PNG's Integrity and Enforcement Agencies

**Department of Prime Minister and National Executive Council (PM&NEC):** The Department of Prime Minister and National Executive Council (PM&NEC), provides national policy oversight and support to the Prime Minister and the National Executive Council. The Office of Security Coordination and Assessment (OSCA) at PM&NEC accommodates and operationalises the Sanctions Secretariat in line with the Procedural Guide and the United Nations Financial Sanctions Act 2015 (UNFS Act). The National Executive Council has policy and political control over the Police Force, including the appointment of the Police Commissioner. Policy and political control over the Police Force is the function of the National Executive Council, exercised through a Minister, in accordance with Section 196 of the *Constitution*.

**Royal Papua New Guinea Constabulary (RPNGC):** The RPNGC or police force is the main investigative agency and has jurisdiction to investigate corruption and money laundering offences, asset confiscation cases, and all serious offences. A clear distinction exists in law between political responsibility, held by the Police Minister, and operational responsibility, which rests with the Police Commissioner. The Commissioner is entitled to exercise that power and responsibility exclusively and is by law not subject to direction or control by any person or authority according to section 198 of the *Constitution*. The Commissioner's powers are established across several PNG laws, positioning the Police Force as a disciplined hierarchy where each member holds a rank and seniority as defined by law (see Police Act 1998, Section 37 on seniority, and Police Regulation 1998, Sections 4, 5, 6). At the top of this structure, the Commissioner oversees the force's organisation, management, and discipline. All members are constitutionally obligated (Section 208(1)) to follow lawful orders, especially those from the Commissioner, upholding the necessary command structure typical in disciplined forces.

**Office of the Public Prosecutor (OPP):** The Public Prosecutor is established by The Constitution and is the principal prosecuting authority of PNG, acting independently in criminal cases. The Public Prosecutor, however, does not conduct its own investigations and arrests, instead they rely on cases initiated by the police, or referred to it by the Ombudsman Commission and the Auditor General. Police lay charges at the committal hearing at the District Court under Part VI of the District Court Act. The police prosecutor is responsible for representing the state in this matter. When the matter proceeds to the National Court proceedings, the Public Prosecutor is responsible for controlling the exercise and performance of the prosecution function of the State pursuant to s. 176 and 177 of the *Constitution*. This is where the Public Prosecutor decides whether to continue with the same charges from the committal hearing at the District Court, or alternate charges, based on the same set of facts and evidence.

**Department of Justice and Attorney General (DJAG):** DJAG is responsible for the administration of legal services to the Government of PNG and its instrumentalities, and the provision of law and justice services to the people. The Attorney General, State Solicitor and the Solicitor General offices are established under the Attorney-General Act 1989. The Office of the State Solicitor acts as the government's legal representative, whilst the Office of the State Solicitor provides state legal advice. The Solicitor General, as the advocate of the state, can only act on the instructions of the Attorney General. The Minister for Justice concurrently holds Attorney General if he has a degree in law.

**Ombudsman Commission:** The Papua New Guinea Ombudsman Commission is an independent constitutional institution established to ensure good governance, accountability, and transparency within the public sector. Its primary roles include investigating complaints about administrative actions of governmental bodies, administering the Leadership Code, investigating discriminatory practices, improving government services, and eliminating unfair legislation and practices. The Ombudsman Commission is established under Section 217 of the Constitution of PNG. The Papua New Guinea Supreme Court has interpreted the Commission's powers and functions in various cases, notably in Constitutional Reference No. 1 of 1978, where it clarified the extent of the Commission's investigative authority. The Court ruled that the Commission can investigate the conduct of state services and governmental bodies, but its jurisdiction does not extend to the Public Solicitor's office unless it involves a Leadership Code matter. The Ombudsman's powers do not extend to private entities and individuals, and public leaders who cease to hold office.

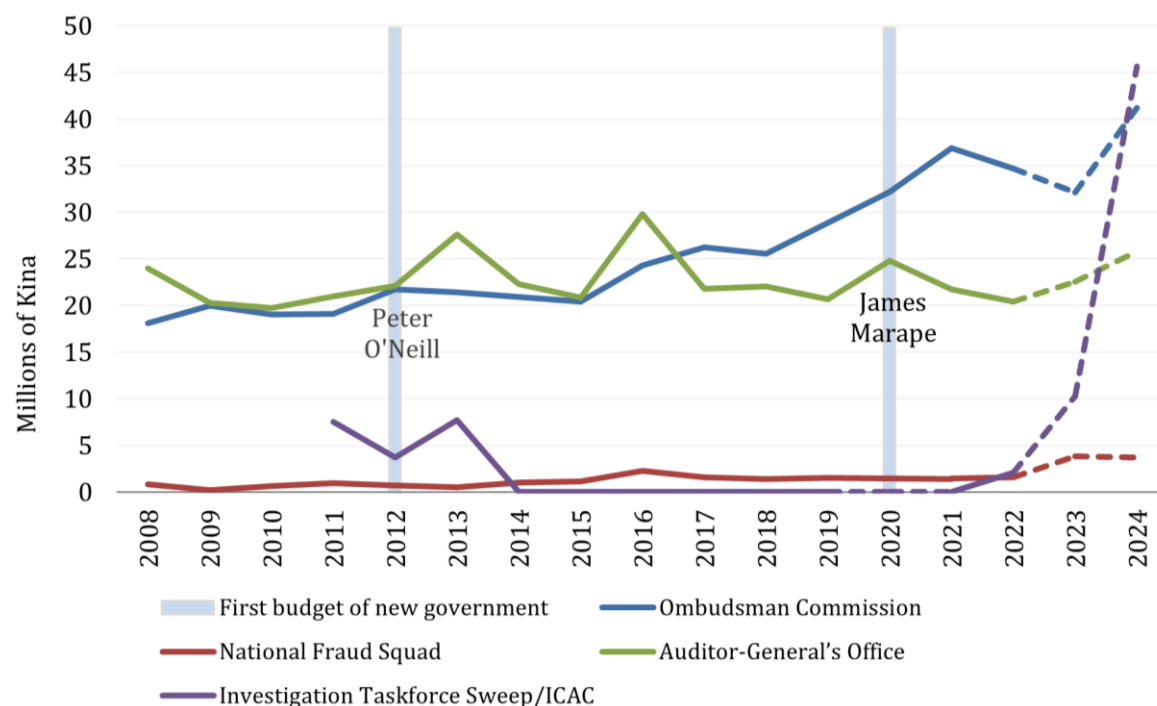
**Auditor General:** The powers and functions of the Auditor General derives from section 214 (1) of the *Constitution* which states that "the primary functions of the Auditor-General are to inspect and audit, and to report at least once in every fiscal year (as provided by an Act of the Parliament) to the Parliament on the public accounts of Papua New Guinea, and on the control of and on transactions with or concerning the public moneys and property of Papua New Guinea, and such other functions as are prescribed by or under a Constitutional Law..." Section 5 of the Audit Act gives powers to the Auditor General to refer the cases of misappropriation identified during the auditing process to the Public Prosecutor, and/or pursue prosecution on its own if the Public Prosecutor fails to do so within 60 days.

**Financial Analysis and Supervision Unit (FASU):** FASU was established in 2015 at the Bank of PNG, is the financial intelligence unit (FIU) for PNG. It is responsible for enforcement of the AMLCTF Act and receives reports submitted by reporting entities under the AMLCTF Act.

**Internal Revenue Commission (IRC):** The mandate of the IRC as outlined in the IRC Act 2014, includes the administration and enforcement of revenue laws to ensure efficient tax collection and compliance. The IRC is responsible for collecting various taxes such as personal income tax, corporate tax, and goods and services tax (GST), which are crucial for funding public services like healthcare, education, and infrastructure. Additionally, the IRC is tasked with advising the government on tax policy and legislation to improve the overall tax system and economic stability of the country.

**Investment Promotion Authority (IPA):** IPA houses the Registrar of Companies (ROC), which maintains a publicly available national registry of most legal persons, including all companies, associations, business groups and business names in Papua New Guinea. The Registrar is also responsible for the collection of beneficial ownership information of companies and business groups, with other legal persons to follow in future.

**Figure 4: Spending on four integrity/anti-corruption organisations, 2008–2024 (2023 figures)**



*\*Calculations based on PNG national annual budgets by Husnia Hushang and Grant Walton*

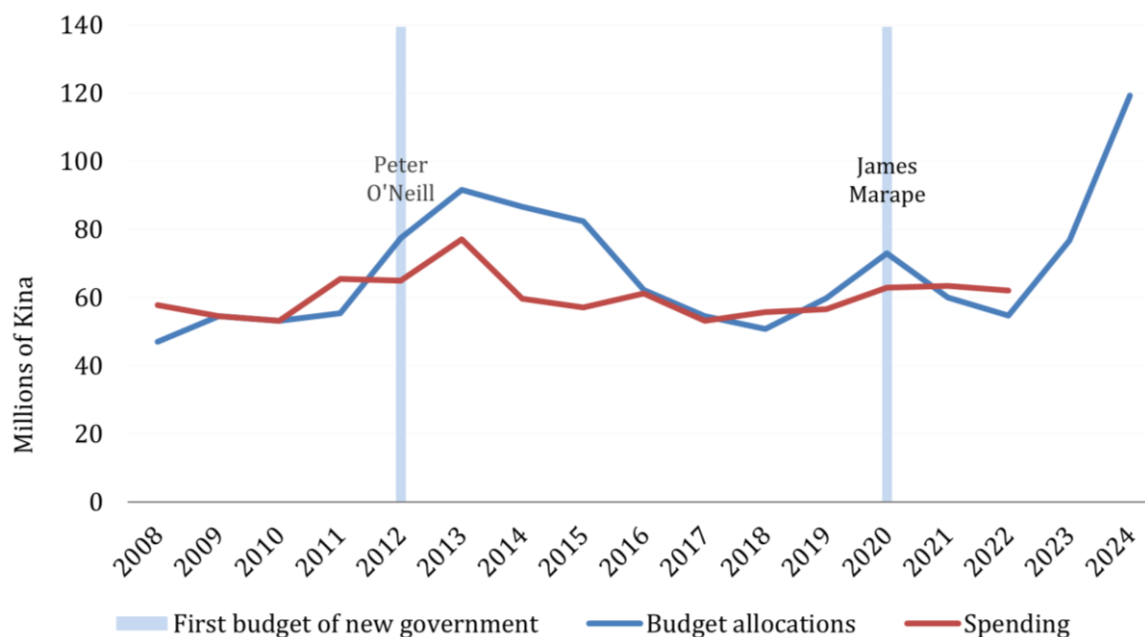
These increases are historically significant, with Figure 5 showing that if all projected allocations materialise, funding for these key state-based integrity and enforcement agencies will be at its highest ever level since 2008. Importantly, on the back of these increases, as an overall proportion of the budget, allocations for these agencies has also risen to its highest point ever, rising from 0.30% of total budget allocation in 2023 to 0.44% in 2024<sup>4</sup>.

In addition, further analysis reveals that there have been significant increases for the Royal PNG Constabulary (RPNGC), with budgeted allocations rising to 610 million kina (in real 2023 figures) in 2024, 61 million kina more than the 2023 allocation. This increase dwarfs funding for the National Fraud Squad which was allocated 3.81 million kina<sup>5</sup>. Although the Attorney General's Department's allocation was slightly reduced, at 215-million-kina per year, budgeted funding for the agency is still higher than previous years.

<sup>4</sup> Calculations based on the national budget by Husnia Hushang and Grant Walton.

<sup>5</sup> Calculations based on the national budget by Husnia Hushang and Grant Walton.

**Figure 5: Total allocations and spending on four key integrity and enforcement agencies (2023 prices)**



*\*Calculations based on PNG national annual budgets by Husnia Hushang and Grant Walton*

These figures, along with recent anti-corruption reforms mentioned above, suggest a recent flourishing of political will towards fighting corruption. However, the effectiveness of these efforts is still to be seen. It is not known how much integrity and law and justice agencies will end up receiving from these allocations until future budgets are released (although early signs are not good as outlined in Section 4: there are reports that the ICAC has not received much of its promised funding). Integrity and enforcement agencies also have significant work to do to turn around poor prosecution and sanctions against corrupt leaders.

Successful prosecutions of and actions against PNG Member of Parliament (MPs) are outlined in Table 1, which provides an assessment of two periods: the first 1975-2007 (a period of 32 years) and 2008 - 2024 (a period of 16 years)<sup>6</sup>. Overall, it shows that since independence, PNG's Leadership Tribunal has dismissed 19 MPs, while 10 MPs have served jail time for criminal offences. Seven MPs resigned to avoid facing the Leadership Tribunal, with two subsequently charged criminally. Eight others received fines, and one was suspended from office for two weeks without pay<sup>7</sup>.

<sup>6</sup> Note due to the nature of Ketan's (which covered 1975-2007) analysis, the authors' needed to compare the time periods in this way.

<sup>7</sup> MPs fall under the category of 'leaders' according to Division 2 of Part III of the Constitution, known as the Leadership Code. Once a 'leader' leaves office, they cease to be subject to the Leadership Tribunal. Nonetheless, the police can initiate criminal investigations even if the MP resigns, resulting in charges against two former MPs who resigned to avoid the Tribunal. Furthermore, evidence presented in the Tribunal may be deemed inadmissible in court (Ketan, 2007), limiting its use by the police in criminal cases.

## Box 2: A case study on the difficulties of prosecuting politicians in PNG

Prosecuting politicians remains a perennial challenge in PNG, and this was highlighted by the case involving former Prime Minister Peter O'Neill in 2014. In August 2011, upon replacing Michael Somare as Prime Minister, Peter O'Neill established a multi-agency investigative body tasked with combating corruption, prosecuting offenders, and recovering illicitly acquired funds and assets. This group, composed of public servants, technical advisors and the police, was later formalised as the Investigation Task Force Sweep (ITFS). The ITFS gained prominence in June 2014 when the Solicitor General raised concerns over payments amounting to K162 million to a law firm without legal briefs — a formal contract between the state and private firms issued by the Attorney General for state representation.

A police officer attached to the ITFS obtained a warrant to arrest the Prime Minister on charges of official corruption, with the approval of Police Commissioner Toami Kulunga. Kulunga was appointed by the O'Neill government when he took office in 2011. However, Kulunga, already embroiled in a contempt case for failing to reinstate Deputy Police Commissioner Geoffrey Vaki, was sentenced to seven months in prison in the same month the warrant for O'Neill's arrest was granted. The National Executive Council seized the opportunity to appoint Geoffrey Vaki as acting Police Commissioner and later confirmed his position. Vaki directed that all files related to the Prime Minister's case be handed to him and the charges dropped. The ITFS resisted, securing court orders to prevent such interference, resulting in prolonged legal battles.

During this period, the Prime Minister leveraged his authority to reshape key positions, replacing Attorney General Kerenga Kua with Ano Pala, who in collaboration with the Acting Police Commissioner Vaki engaged a private law firm to deal with a stay application of the warrant, preventing the arrest. The in-house police legal team were sidelined. Deputy Police Commissioner Operations Simon Kauba publicly urged the Prime Minister to cooperate with the National Fraud Squad and present himself for questioning, leading to him being replaced. Similarly, Assistant Police Commissioner Thomas Eluh, who led the investigation into the Prime Minister, was suspended. Attorney General Ano Pala argued that the Solicitor General lacked the authority to pursue the case without explicit approval under the Attorney General Act. When the Solicitor General refused to withdraw the case, he was removed, and the court ultimately dismissed the matter on procedural grounds. Following these events, the ITFS was disbanded. Between 2011 and 2014, the ITFS had investigated 27 high-profile cases involving allegations such as misappropriation, conspiracy, official corruption, money laundering, and abuse of office, uncovering misappropriated sums worth millions of Kina. (*Koim v. O'Neill* [2014] PGNC 147; *Pala v Koim* [2015] PGSC 21; SC1436).

Table 1 also shows that both non-criminal outcomes and criminal prosecutions appear to be slowing down. Given the time periods, one might expect outcomes in the second period (2008-2024) to be half of the first (1975-2007). However, the analysis finds significant discrepancies, with only four dismissals from office in the second period compared to 16 in the first (all being equal we would expect eight dismissals in the second period), and nine politicians imprisoned in the first period compared to two in the second. In other words, non-criminal outcomes and prosecutions are lower between 2008-2024 than historical trends suggest they should be. Box 2 provides an example on the challenges involved in prosecuting politicians in PNG.

**Table 1: Non-criminal outcomes and prosecutions of politicians since 1975**

	1975 - 2007		2008-2024		1975-2024
Penalty	Non-criminal outcomes	Criminal Prosecutions	Non-criminal outcomes	Criminal Prosecutions	Total
Dismissed from office	16		2	2*	20
Fined but remained in office	5		3		8
Imprisoned		9		2**	11
Resigned from office	7				7
Resigned but criminally charged		2			2
Suspended	0		7		7

Source: Ketan (2007) from 1975 - 2007; Authors: 2008 - 2023 \*Two MPs who were jailed following criminal prosecutions were subsequently dismissed; \*\*One of the MPs, Potape, served 7 months in jail and released when charges were overturned by the Supreme Court, so the analysis does not count him as a criminal prosecution.

The country's ability to respond to transnational threats has also come under some criticism. The recent mutual evaluation of PNG's money laundering and counter terrorist financing (AML/CTF) regime by the Asia Pacific Group on Money Laundering (APG MER) has found that the country has made some strides in improving its technical compliance (the necessary laws, legal instruments and regulations required to meet the Financial Action Taskforce's 40 Recommendations on addressing AML/CTF [FATF, 2022]). However, it is failing to perform against effectiveness metrics (what the APG calls "immediate outcomes", which involves an assessment of how well countries implement laws, regulations and policies to address AML/CTF threats) (APG MER, 2024). Notably, there have been no successful prosecutions for money laundering in the sectors identified as high risk by the 2024 APG MER and PNG's own assessments. As a result, it is likely, though not inevitable, that PNG will find itself on the FATF's grey list in 2026. While this might spur efforts to improve AML/CTF compliance within the country, such measures can also lead to unintended consequences, including making it more difficult for citizens to get a bank account and repelling international investment (Kabuni and Walton, 2025).

## 2.2 Civil society

PNG's civil society comprises a diverse array of church-run and secular organisations, local and indigenous groups, as well as branches of international non-governmental organisations (ADB, 2015). Some commentators suggest that the growth of civil society in PNG has been significantly influenced by overseas donors and foreign aid programs (Kenway, 2011), while others have characterized PNG's civil society as still “embryonic” (Tararia & Ogle, 2010). Nevertheless, civil society groups have become increasingly involved in addressing corruption and governance issues.

Key civil society organisations advocating for good governance and anti-corruption work include:

- (i) Transparency International PNG (TIPNG),
- (ii) Consultative Implementation and Monitoring Council (CIMC),
- (iii) Centre for Environment and Community Rights (CELCOR), and
- (iv) ACT NOW PNG!
- (v) Churches

Each of these organisations is described in turn below.

### **Transparency International PNG Inc. (TIPNG)**

Transparency International Papua New Guinea (TIPNG, 2024), established in 1997, serves as the national chapter of the global Transparency International movement. According to its website, TIPNG aims to promote transparency and accountability in both public and private sectors through education, advocacy and community empowerment. TIPNG engages the public in understanding the impact of corruption and provides avenues for citizens to take action through various initiatives.

TIPNG runs an Anti-Corruption Help Desk (AnCoHD) which offers free and confidential legal advice to individuals who have witnessed or fallen victim to corruption, addressing issues such as bribery, nepotism, and abuse of authority. TIPNG also conducts the National Integrity System Assessment (NISA), which evaluates PNG's anti-corruption frameworks and identifies gaps to guide reforms. Through partnerships with agencies, TIPNG develops internal anti-corruption strategies for the government organisations. It runs investigative journalism workshops, awards, and national summits, and help monitor constituency development funds known as Service Improvement Program (SIP) funds (see Box 3). TIPNG has also run the School Based Civic Education Project with the National Department of Education, which aims to, “create a generation of responsible citizens that work to ensure good governance at all levels of society” (Kaiku, 2019).

TIPNG also prioritises electoral integrity through its Building Elections Integrity through Partnerships (BEIP) initiative. By collaborating with the PNG Electoral Commission and other stakeholders, TIPNG runs voter education and governance in election processes. Ahead of the 2022 general elections, the organisation focused on raising awareness about voter registration and the electoral system, while supporting provincial election offices through governance training. TIPNG also routinely engages in other national, regional and international fora.



## **Consultative Implementation and Monitoring Council**

The Consultative Implementation and Monitoring Council (CIMC) of Papua New Guinea was established in 1998. It was created by the National Executive Council to serve as a collaborative platform that brings together representatives from civil society, the private sector, and government entities to contribute to policy development and to influence and oversee government decision-making processes. While CIMC operates as a quasi-governmental organisation, it is administered by the Institute of National Affairs, an independent non-profit research institute.

The primary role of the CIMC is to facilitate dialogue among the government, private sector, and the broader community through continuous consultation processes. These processes aim to ensure that recommendations from the community are incorporated into laws and policies. Recommendations generated by the CIMC are submitted to the National Planning and Monitoring Department, with the expectation that the responsible minister will present them to the National Executive Council or Parliament for further consideration and action (INA, 2024).

## **Centre for Environmental Law and Community Rights**

The Centre for Environmental Law and Community Rights (CELCOR) in Papua New Guinea was established in February 2000. It is a not-for-profit, public interest law and advocacy organisation that provides legal advice and assistance to landowners, community-based organisations (CBOs), and NGOs involved in natural resource management. They also engage in environmental policy research and development, environmental litigation, lobbying, and capacity building for lawyers and campaigners (CELCOR, 2024).

## **ACT NOW! PNG**

ACT NOW! PNG is a community organisation that advocates for the five National Goals and Directive Principles enshrined in the PNG Constitution. Their advocacy therefore focuses on equitable distribution of the country's wealth, government services, and environment protection. The activities of ACT NOW! include raising public awareness, advocating for policy changes, and mobilizing community action on issues such as corruption, land rights, and environmental protection. They research illegal logging, land grabbing, and other forms of exploitation that threaten the livelihoods and rights of local communities (ACT NOW! PNG, 2024).

## **Civil Society Networks**

Existing Civil Society Organisation (CSO) networks in Papua New Guinea lack direct channels to influence government decisions beyond advocacy efforts. Transparency International Papua New Guinea, however, has established Memorandums of Understanding (MOUs) with key integrity institutions to strengthen collaboration. The Civil and Military Coordination (CIMC) body is the only quasi-governmental entity providing a direct mechanism for CSOs to present recommendations to the government, working through the Department of National Planning and Monitoring.

In recent years, Papua New Guinea (PNG) signed up to the Open Government Partnership (OGP) to promote transparency, accountability, and public participation, granting major civil society organisations greater influence over government policies (PNG OGP Action Plan 2022 -2024). Under the OGP, PNG is required to identify commitments for implementation across a series of two-year action plans, which are evaluated at the end of each cycle. In the 2022-2024 Action Plan, PNG outlined 16 commitments divided into six clusters. Each cluster had a designated implementing agency or agencies as co-chair, with a civil society organisation as the other co-chair.

The OGP offers CSOs an opportunity to influence government policies and reforms. In this framework, CSOs serve as co-chairs of specific clusters alongside government agency representatives. While CSOs can propose policy changes, the responsibility for advancing these reforms to the ministerial level lies with their government agency co-chairs. This structure highlights the reliance on government counterparts to advocate for and implement proposed changes effectively (PNG OGP Action Plan 2022 - 2024). However, a review of the Action Plan 2022 - 2024 shows that despite strong efforts from the CSOs and handful of government departments, PNG failed to satisfactorily meet its commitments (OGP, 2025). Consultations are underway to devise the next Action Plan.

## **Churches**

With 96% of the population identifying as Christian in the 2000 and 2011 censuses (National Statistical Office, n.d.), PNG's churches in play a critical role in providing ethical guidance on a range of issues. They have been involved in anti-corruption movements across the country – this includes joining with other members of civil society being a part of the Community Coalition Against Corruption. In a 2011 citizen survey the churches were considered the most effective anti-corruption institution in the country (Walton, 2013a). The churches also deliver up to half of the country's health and education services, which requires working closely with government departments. This can mean some church leaders can be cautious about speaking out against government corruption to maintain good relationships with their service delivery partners. The churches are not immune to accusations of corruption themselves, with qualitative research showing that some respondents were concerned about the local church's corrupt activities (Walton 2013b).

### **2.2.1 Media**

Producing quality journalism in Papua New Guinea can be difficult, largely due to systemic issues such as inadequate education and training for journalists, limited resources, and external pressures. According to Neville Choi, President of the Media Council of Papua New Guinea, declining standards are not solely the industry's fault but are exacerbated by a struggling education system that fails to adequately prepare aspiring journalists (Tingkeo, 2024). Journalists are conscious of this, often pointing out that they lack the necessary support and resources to conduct in-depth investigations (Wase, 2022). These challenges are not unique to PNG. A study which surveyed over 200 journalists in nine countries and was published in 2021, revealed that Pacific journalists are amongst the youngest, most inexperienced and least qualified in the world (Singh & Hanusch, 2021).

PNG media generally enjoy freedom in reporting; however, this is occasionally threatened. In 2019, Neville Choi, Head of News at EMTV, was dismissed for refusing to comply with

orders to not air a story about a military protest outside the Prime Minister's office, and his refusal to terminate fellow journalist Scott Waide. Scott Waide reported on the New Zealand Prime Minister Jacinda Ardern's decision not to ride in government Maserati cars when hosting the APEC summit (Andrew, 2019). Following public backlash and a strike by EMTV journalists and production staff, Choi was reinstated (Post Courier, 2019). Prime Minister Marape has accused the media of aligning with political opponents (Ligaiula, 2022), reporting on election related violence and deaths (Joku, 2022), and spreading fake news (Department of Information and Communications Technology, 2022).

In 2023, Minister for Communications and Information Technology, Timothy Masiu, himself a former journalist, released a draft national media policy as a precursor to proposed media legislation, which he claimed would "facilitate the use of media as a tool for development, such as the promotion of democracy, good governance, human rights, and social and economic development" (Lepani, 2023). Many journalists, however, saw this as an attempt to stifle media freedom in PNG (Waide, 2023; Lepani, 2023). The government has not yet approved the draft policy.

### Box 3: District Services Improvement Program: service provision or 'slush funds'

To overcome the difficulties in delivering services given the remoteness of much of its population, the PNG Government has been pursuing an aggressive policy of decentralisation over the past decade. This was marked by the passing of the District Development Authority Act (State of Papua New Guinea, 2014) in 2014, which establishes district administrations as separate legal entities. The newly established District Development Authorities (DDAs) now have expanded functions, can sue and be sued, and are guided by rules and regulations as to how their funds are spent (Papua New Guinea Department of Implementation and Rural Development, 2013).

Under these arrangements the Open Member (the MP representing a particular district) chairs a committee that includes District administrators, LLG Presidents and community representatives (such as church representatives, women's representatives, youth representatives) who ostensibly monitor spending decisions and influence how revenue is allocated and disbursed. Revenue for these committees have risen exponentially over the past 10 years, with each of PNG's 96 districts now allocated up to 20 million Kina through the District Services Improvement Program (DSIP). While there is some evidence DSIP funds are directed to development priorities, some commentators are concerned that much of this funding goes to waste through mismanagement and corruption (Laveil, 2021), which has led many to label the DSIP as "slush funds".

## 2.3 Political actors

PNG's political landscape is marked by strong forms of patronage politics that often trumps the formation of strong political parties based on ideological lines. During the last parliamentary term (2017-2022), out of 111 MPs elected in 2017, only 40 remained with their original parties (PNG Election Database, 2024). The fluid movement of MPs during this time led to James Marape replacing Peter O'Neill as the prime minister in 2019. Since its independence in 1975, PNG has seen only two prime ministers complete their terms, with the majority being ousted through votes of no confidence or resigning to avoid them.

Many politicians have themselves been accused of corruption, though there have been very few convictions (see Table 1 above). For example, Prime Minister Marape quickly reshuffled the cabinet in late 2023 and appointed William Duma minister for State Owned Enterprises (SOE), to oversee the investigations of allegations of corruption with PNG Ports. This followed a report by the Australian Broadcast Commission (ABC) and the Organized Crime

and Corruption Reporting Project (OCCRP) naming both James Marape and William Duma having ties to the mastermind behind the PNG Ports corrupt deals. The investigation by PNG police subsequently found no wrongdoing, clearing both Duma and Marape's names (The National, 2024). Accusations of corruption involving politicians are also associated with decentralisation efforts that have ramped up over the past 10 years, as outlined in Box 3.

## 2.4 Donors and geopolitics

Key donor agencies supporting significant anti-corruption initiatives in PNG include the Australian Department of Foreign Affairs and Trade (DFAT) and the European Union (EU). According to the recently launched Australian Aid Transparency Portal (AusDevPortal), PNG received the largest share of Australian aid between 2022 and 2023, with 138 projects valued at approximately A\$644 million — more than double the A\$307 million allocated to Indonesia, the second-largest recipient. As Walton (2017) notes, promoting good governance has been a central focus of Australian aid since the 1990s, particularly in PNG, with initiatives ranging from support for integrity institutions such as the Ombudsman Commission to civil society organisations like Transparency International PNG.

The PNG-Australia Bilateral Security Agreement (BSA), signed in 2023, represents the most recent commitment to Papua New Guinea's anti-corruption efforts. The agreement allocates A\$200 million to support PNG's law, justice, and internal security priorities (PNG BSA, 2023). At the 30th PNG-Australia Ministerial Forum in June 2024, ministers from both countries reaffirmed their commitment to completing the domestic processes required to operationalize the BSA. This funding will support the expanded Australia-PNG Law and Justice Partnership, launched in January 2024, which focuses on strengthening judicial, prosecutorial, and correctional systems. It also aims to improve access to justice for youth and rural communities, enhance infrastructure and institutional capacity, and provide training for the PNG police. Additionally, the ministers emphasized the importance of improved coordination between policing and justice institutions in both countries. The BSA also prioritizes strengthening anti-corruption and anti-money laundering mechanisms, counter-terrorism efforts, transnational crime prevention, and regional security initiatives (PNG-Australia Joint Communiqué, 2024).

In 2019, PNG approached the International Monetary Fund (IMF) to strengthen funding partnership through an IMF Staff-Monitored Program (SMP). IMF SMP is an informal agreement between member country and IMF staff to monitor the country's economic programs. SMPs are often used when a country is not fully prepared for an IMF-supported program, due to limited policy implementation capacity, domestic instability, or lack of financing assurances. By meeting SMP requirements, a country can build a record of sound policy, potentially leading to an IMF financial program or emergency assistance. PNG agreed to six key reforms to be monitored, one of the key reforms under the SMP was to pass legislation for an ICAC (IMF Staff Country Reports, 2022). After PNG passed the ICAC law in 2020 (Darmadi, 2020) along with other reforms, it entered into an Extended Credit Facility and Extended Fund Facility arrangement with the IMF. PNG had access to \$900 million in financial support over 38 months (IMF, 2023). Operationalisation of ICAC is one of the key components that guarantees continued access to the IMF funding (IMF Staff Country Reports, 2023).

The EU's support for anti-corruption in PNG is framed within the EU-PNG Partnership for Good Governance 2020-2026 (European External Action Service 2023). Under this agreement, the EU allocated K100 million to the *Preventing and Countering Corruption in Papua New Guinea Project* (PNG Anti-Corruption Project). This initiative is jointly implemented by the United Nations Development Programme (UNDP) and the United Nations Office on Drugs and Crime (UNODC) and funds the National Anti-Corruption Plan of Action (NACPA) 2020-2025, which operationalizes the National Anti-Corruption Strategy 2010-2030. The PNG Anti-Corruption Project focuses on bolstering core anti-corruption institutions, including the newly established ICAC, the Royal Papua New Guinea Constabulary, national and provincial fraud units, and the Office of the Public Prosecutor. It also supports efforts by non-state actors such as civil society organisations, the private sector, youth, and media.

While these efforts are to be welcomed, donors have faced challenges in addressing high-level political corruption in PNG. For instance, the Australian government was criticised for not publicly condemning efforts to shut down Taskforce Sweep in 2014 (Walton and Howes, 2014). More recently, Australia along with other donors have had to tread carefully when engaging with the PNG government over concerns about governance. This hesitancy can be partly explained by the geopolitical rivalry with China<sup>8</sup>, which some have suggested shapes the West's approach to the Pacific region (Keen & Tidwell, 2024). Still, there have been considerable efforts by various donors to curb corruption in the country through technical assistance, institutional strengthening initiatives, and aid conditionality.

### 3. Methodology

Research was conducted by Grant Walton and Michael Kabuni of the Crawford School of Public Policy, Australian National University. The ANU was engaged by UNODC PNG to, according to the contract, "conduct a rapid political economy analysis to provide key insights into corruption and transnational crime dynamics in PNG". The analysis is designed to provide understanding of:

- the foundational influences shaping corruption and money laundering in PNG,
- the institutions connected with corruption and money laundering, and
- opportunities and constraints for generating political will and law enforcement action at the subnational and national levels.<sup>9</sup>

The methodological approach deployed in this research project is shaped by USAID's applied political economy assessment framework (Menocal, et al 2018). This approach stresses the importance of focusing on the "institutions, power dynamics and incentives that are not aligned with reform efforts" (Menocal, et al 2018: 3). It focuses on strategic and pragmatic analysis that focuses on grounded and contextual realities rather than 'best

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<sup>8</sup> Indeed, Australia launched the "Step Up" in 2017 as a response to China's increasing presence in the Pacific. The initiative emphasises development assistance in education, healthcare, and infrastructure. New Zealand's "Pacific Reset" of 2018 focuses on collaboration and regional priorities such as climate change and disaster resilience.

<sup>9</sup> The research efforts focus on corruption and money laundering, which are key features and enablers of transnational and organised crime.

practice' or top-down frameworks. In turn, this research project has interviewed those working in PNG on integrity issues, particularly those with a long working history with the country, to understand how political will shapes anti-corruption reform, whether improving political will is possible, and if so how to do it.

The research is also framed by debates about political will and anti-corruption in the academic literature. Post and colleagues (2010) define political will as:

the extent of committed support among key decision makers for a particular policy solution to a particular problem

Given this definition, political will can apply to anyone deemed key to making decisions about or seeking to influence a particular policy. However, many scholars acknowledge that political elites play a particularly critical role in addressing corruption, particularly in poor countries (Batory 2012; Quah 2017; Schnell 2018). Drawing on Senior (2006), Quah (2017) notes that political leaders have the power to address corruption if they wish as they can enact laws and allocate funds to enforce them. In turn, many scholars consider political elites an essential, but by no means only, part of the "political will" required to address corruption (Batory 2012; Brinkerhoff 2000; Quah 2017; Schnell 2018).

This is particularly the case in economically poor countries where, due to the weakness of state institutions and civil society, political elites can play a strong role in shaping policy. Brinkerhoff (2000) argues that while the political will to address corruption requires more than adopting laws and ratifying treaties, this is a common response from both governments and the international community. Indeed, Mungiu-Pipidi (2011) argues that most anti-corruption strategies fail because reformers focus on increasing legal constraints in countries that themselves struggle to enforce the rule of law. Thus Ristei (2010) calls for policymakers and researchers to differentiate between 'demonstrated political will' and anti-corruption rhetoric. However, despite some notable exceptions (e.g. Batory, 2012) there is still very little literature about the ways political elites both enable and undermine political will towards anti-corruption reform.

In turn, research informing the project was designed to incorporate a wide variety of perspectives. This included interviewing political elites, as well as those from the government, donors, civil society and the private sector who can shape political will. Thus, as outlined in Table 2, this research draws on semi-structured interviews with 27 respondents from a variety of sectors involved in anti-corruption reform. To get insights from relevant stakeholders, respondents were identified through a snow-ball sampling technique; that is, the researchers identified relevant people from their and UNODC's existing network and requested an interview. Those interviewed then referred the lead researcher on to others, who did the same in turn. After gaining ethics approval from the Australian National University, interviews (undertaken by Grant Walton) took place either face-to-face or over zoom in Port Moresby, Papua New Guinea, and Canberra, Australia between April and May, 2024. Guiding questions are outlined in Annex 1.

**Table 2: Respondents' current position**

Position	No of respondents
<i>Ex-politician</i>	1
<i>Civil Society</i>	4
<i>Donor</i>	5
<i>Consultant/advisor</i>	2
<i>Government department</i>	4
<i>Integrity agency</i>	11
<b>Total</b>	<b>27</b>

The research is also informed by a desk review of relevant materials, including an analysis of academic articles and books, policies, reports, plans and media.

## 4. Findings

This section reports on key findings from the interviews undertaken with 27 key stakeholders. It comprises two sections. The first section focuses on respondents' reflections on how corruption is defined and its causes. The second section highlights the way respondents evaluated anti-corruption efforts and the role of political will in addressing it.

### 4.1 Definitions and Causes

#### 4.1.1 Definitions of corruption and political will

Collectively, respondents defined corruption as the “abuse of entrusted power for private gain” – a prominent definition reflected by international donors and governments around the world (Walton, 2015). By focusing on the role of private actors separate from state representatives this definition is broader than others that focus on the involvement of state officials (this is the case when corruption is defined as the “abuse of *public office* for private gain”). That is, respondents defined corruption as the “abuse of entrusted power for private gain” which allows for corruption between and *within* the state, private sector and civil society. This definition was deployed when respondents focused on corruption involving public servants and politicians, as well as non-state actors – including middlemen and women facilitating money laundering and transnational logging companies that bribe landowners and transmit their illicit finance to far flung corners of the globe.

Having said this, the way most respondents defined corruption was narrower than how many Papua New Guineans do. Walton (2015) has shown that rural and marginalised citizens consider many examples of wrongdoing which do not involve people in positions of power as corruption. This can include making homebrew (alcohol) and prostitution (Walton, 2015).

When asked to define political will, most respondents reflected the sentiment of a member of the government with a long history of engagement in anti-corruption efforts:

To me political will is all about support from the top. By that I mean the government of the day, especially the Prime Minister.

Others, however, cautioned against thinking about political will in such narrow terms. One civil society leader, for instance, argued that conversations about political will needed to be more “nuanced”. An external advisor said that political will had to account for “[t]he relationship between institutional power and where...power reside[s].” As outlined in section 4, this broader interpretation of political will is reflected by political scientists and other scholars who research political will and corruption (Batory 2012; Quah 2017; Schnell 2018). In turn, the following section explores the multiplicity of sources of power that influence the effectiveness of anti-corruption reforms in PNG – from politicians to civil society to donors and others.

#### **4.1.2 Causes of corruption**

When reflecting on the key causes of corruption, responses can be categorized into two distinct categories: need and greed corruption. Bauhr (2017: 561) differentiates between these two ways of framing corruption by noting that the first applies when corruption is needed to gain access to “fair treatment”, whereas greed corruption is when it “is used to gain special illicit advantages”.

##### **Need corruption**

Many respondents noted that corruption in PNG can be driven by genuine needs facing citizens due to poverty, the weakness of the state and strong social and cultural ties and obligations. Papua New Guinean respondents were most likely to focus on these drivers of corruption. For example, a Papua New Guinean respondent working for a government department said people might engage in small-scale corruption because of “the high cost of living, [and] the inefficiency of [government] systems”. Another Papua New Guinean advisor noted that ordinary people were involved in corruption “because of the harsh economic situation”, and that this plays out during elections:

During elections they see it as an opportunity to make money out of the candidates [because] they need money to survive, they need money to buy food, especially those who are staying in the towns. So, the only way to help them out is to go by way of corruption.

Another government official drew attention to the role culture played in driving corruption, noting that the country’s cultural and linguistic diversity was:

one of the main contributors to corruption in the country. It's our diversity, our background that we bring here to the modern economy. As you've heard, most of these contribute to cronyism, *wantokism*, and nepotism.

In a sense, these responses are not new: researchers and policymakers have long highlighted the challenges that “need corruption” presents for anti-corruption efforts (Bauhr,



2017). What is interesting, however, is that these sentiments were most likely – though not exclusively – expressed by Papua New Guinean respondents. They were most keenly attuned to the challenges that their countrymen and women faced and how those difficulties helped perpetuate corruption in their country. Responses reflecting the important needs that some forms of corruption fulfil are also a reminder that while corruption might be perceived to be “rampant” there is an invisible dividing line between, as one integrity official put it, “those who have [money] and those who do not”, with the former “creaming” off the country’s spoils for their own gain, while others use corruption as a means to survive.

At the same time, constituents have increasingly come to expect that politicians redistribute state resources at their disposal to hold on to power. This is particularly due to the increase of District Services Improvement Program (DSIP) and Provincial Services Improvement Program (PSIP) funds which politicians often distribute to supporters in order to get re-elected, and in turn deepen patronage ties. A civil society representative explained that, because many citizens now expect to receive money from their member of parliament, their anti-corruption awareness campaigns during elections that urge citizens not to accept bribes don’t appear to be having a significant impact. Politicians, he said, were taking “full advantage of the ignorance” of people. As one former politician noted, “when you start allocating money to members of parliament hoping to hold on to power” politicians are “incentivised” to engage in corruption. In turn, corruption becomes a never-ending collective action problem, with both politicians and citizens incentivised to take part, and few willing to change the status quo.

### **Greed corruption**

The drivers for “greed corruption” can be divided into acts involving those within the country and those external to it. For most respondents, corruption was primarily caused by internal actors; particularly by the country’s political class, notably politicians and those in senior positions within the government. As one civil society leader noted, “the key driver [of corruption] is the political class”. Respondents saw politicians and their offsiders responsible for corruption in what they believed to be the most vulnerable sectors, notably forestry, government procurement, state-owned enterprises and during elections. Procurement was a key area of concern, with one advisor arguing that anti-corruption efforts needed to focus on cleaning up national level government departments because,

that's where most of the money is, that's where most of the procurement is. ...at [the] local level there's going to be corruption, but it's at a low level. ... you've got to look at where the money flows are, where the big procurements are, those things that ministers or MPs are involved in, because that's where the corruption will be.

Nearly all pointed to the rise of fiscal decentralisation through increased District and Provincial Support Improvement Program (D/PSIP) grants – constituency development grants that are significantly controlled by politicians – as helping politicians effectively buy votes by rewarding constituents with projects paid for by this largesse. For many, fiscal decentralisation down to the district level is a step too far.

As one government department official noted:

going below the provincial level [means] we're just going to be throwing money away because there are no systems in place. I think the local level governments have real potential, because they're answerable right there in the village. But...there's nothing in place to control anything. I think the provincial levels have invested in financial management systems. The provincial level is really where there are a number of rules and there are enough acts in place and legislation to enforce it. Whereas [when we] get down to the DDA [District Development Authority, the administrative body at the district level], well, who's going to enforce the DDA?

Concerns about governance of DDAs have been highlighted by scholars also (see Howes et al 2022; Laveil, 2021), though some have noted that the governance of some DDAs (such as those in East New Britain province) are better than others (such as those in Gulf province) (Walton 2019). So, while respondents are right to be concerned about DDAs and their use of DSIP funding, policy makers need to be careful about applying disfunction and corruption to all of the country's district governments.

### **External actors**

While most respondents focused on drivers of corruption emanating from within the country, some – particularly those living outside of the country – were keen to acknowledge the role of external actors. The range of actors outside the country who respondents felt were involved in facilitating or benefiting from corruption taking place in PNG varied: from organised criminals to Chinese traders and Australian companies, to banks, real estate agents and casino operators. For example, a civil society activist spoke about the impunity with which logging companies have been able to transfer logs – obtained through alleged corrupt dealings and human rights abuses – and with resultant profits moving offshore with little fear of prosecution. Another external adviser argued that the reliance on the country's extractive sector has fuelled a type of corruption that is fundamentally crippling the state's ability to deliver services and protect its own boundaries. He and other respondents argued that PNG's reliance on resource wealth provides a source of largesse for political elites that, while benefitting the country's politicians as well as international investors, has yet to significantly trickle down to improved government services or living conditions. These respondents highlighted the corruption risks that come with industries integrated into the global economy.

Respondents working in, or familiar with, the anti-money laundering sector emphasised the lack of effective measures to stop ill-gotten money funds from moving overseas. One external consultant said:

The money [from corruption] crosses borders. And you have to kind of ask about some of the effectiveness of the controls to stop the flow of money both [in Australia] and in PNG... [B]asically the money flows with impunity, it's not sophisticated in any way, shape, or form...

This respondent went on to say that "There's a lot of money that flows ... and there's literally no sheriff in town to stop [it]", which while not technically true – as outlined previously there

are a number of institutional (including FASU) and laws in PNG designed to address money laundering – captures the frustration of some concerned about the lack of effective response to PNG’s response to the problem.

While money laundering persists, moving corrupt money out of PNG has to some extent been constrained due to currency rationing. Over the past ten years, Papua New Guinea has faced a shortage of foreign currency, with the Central Bank implementing rationing measures. To take legal and ill-gotten gains out from PNG, individuals primarily need to convert their currency to US dollars, which has been in short supply (Davies & Schroder, 2018). Those engaged in illicit activities, including corruption, often circumvent this issue by providing local export companies with local currency, which then transfer the equivalent amount in foreign currency to the criminals' offshore bank accounts. Money continues to be laundered within PNG unabated, but overseas flows have been affected by foreign currency shortage.

Some traced the country’s current problems back to the institutions transferred from Australia and other parts of the world. For example, an ex-politician blamed corruption in the country on the unicameral parliament and electoral system. He believed the parliamentary and voting systems (both first-past-the-post and limited preferential systems) have failed to adequately respond to PNG’s patronage system that is driven by poverty, cultural ties, weak state institutions and an ethnically fragmented population. And that the country’s unicameral system of government lacks the checks and balances necessary to ensure proper oversight of politicians.

In sum, the causes of corruption in PNG are complex, but it is helpful to think about corruption driven by “needs” (driven by social and cultural obligations, poverty, and other constraints) and “greed” (illicit behaviour for self-gain by those sufficiently enfranchised). Challenging populist narratives that call for zero-tolerance towards all corruption – that is that corruption in all its guises must not be tolerated (see Government of Papua New Guinea, 2020; Department of Prime Minister and National Executive Council, 2023) – many respondents said that marginalised Papua New Guineans often need to engage in some forms of corruption. Some also noted that the patronage system fuelled by fiscal decentralisation made the line between need and greed corruption increasingly blurred. Most were concerned that politicians and their associates were driving and enmeshed within what might be labelled “greed corruption”.

Corruption in PNG has been driven by networks of state and non-state actors that reach across borders and rely on middlemen and women associated with illegal (organised crime groups) and legal (e.g. logging and mining companies) entities that span the globe. Greed corruption will likely continue to intensify through both internal drivers (e.g. fiscal decentralisation, weak oversight mechanisms, underfunding of integrity and enforcement agencies, etc) and as PNG continues to engage with the global economy and the licit and illicit actors that invest in and move money away from the country. The challenge then is to build a broad and deeply rooted political will towards anti-corruption reform that responds to these realities.

## 4.2 Anti-corruption reforms and political will

As noted earlier in this report, PNG has recently seen a host of anti-corruption reforms that suggest the government is serious about addressing corruption. This section examines respondents' views about these reforms and the potential for building political will for more meaningful responses to corruption in the country.

### 4.2.1 Evaluating anti-corruption reforms in PNG

When asked to evaluate anti-corruption efforts, many respondents were cautiously positive. One donor representative said she thought the government established the ICAC “with a sincere wish” that it would be successful. She also noted that numerous key agencies were involved in developing PNG’s national anti-corruption plan of action (Government of Papua New Guinea, 2020), suggesting that the plan had broad government support. A few respondents believed that recent anti-corruption reform had high-level political support. A Papua New Guinean respondent with a long history of engagement with integrity issues went so far as to say,

We are fortunate to have two consecutive prime ministers who had the political will to support anti-corruption initiatives. Peter O'Neill was one of the first Prime Ministers who supported anti-corruption in the country. That ... came in the form of supporting all our reforms, both administratively, financially, and [the] passing of legislation. Mr O'Neill started off the process by amending the Constitution in 2014. He took it to parliament, and they passed it overwhelmingly.

Like this respondent, others highlighted the importance of senior politicians signalling that anti-corruption reform is being taken seriously. One Papua New Guinean working for a key integrity agency said that support from the top signalled to his agency that they had the green light to tackle corruption head on:

Mr [Davis] Stevens [current MP and Deputy Prime Minister from 2019 – 2020] and then [Prime Minister] Marape pushed the reforms. When you have people like this, it's a dream: let's go. So that's ... political leadership, political will.

The most visible symbol of political will towards anti-corruption reform in PNG is arguably the newly established ICAC. While the ICAC is still establishing itself, most respondents were cautiously optimistic about the organisation’s potential and the decision to appoint foreign commissioners to lead this organisation<sup>10</sup>. One civil society leader said,

The rationale was bringing [people in] from outside who would be independent and would help with fighting against corruption. Our own people have already been politicised. We thought those from outside would do the job.

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<sup>10</sup> ICAC Commissioner Andrew Forbes and Deputy Commissioner Operations Daniel Baulch come from Australia, while Deputy Commission Prevention and Corporate is from New Zealand.

Another Papua New Guinean who worked for a government department argued that “due to our diversity and our connections with our ethnic group, tribes and clans” the only way the ICAC could be effective would be bringing in outsiders.

In other words, while there are plenty of reasons to be cynical about recent anti-corruption reforms some respondents were rather optimistic. It is true that some of these more positive assessments were from government representatives who were keen not to contradict government policy and efforts. However, even some of what might be labelled “hardened veterans” – those who have been involved in anti-corruption reforms in PNG for a long time – were prone to cautious optimism. The government’s reforms have generated a kind of good will that observers have not previously witnessed. Yet, there were some who raised serious and significant concerns that might grow if reforms fail to gain traction.

### **The critics**

While many were optimistic, some noted that the biggest test for the government’s recent reforms was yet to come: implementation. One local civil society leader said, “in terms of deterring corrupt conduct, the reforms have not made noticeable differences. [I] haven’t seen reductions in [corrupt] actions, or [an] improvement in convictions”. This respondent argued that the conviction of lawyer Paul Paraka for misappropriating 162 million kina of state funds was an “outlier” – an exception that proved the rule that prosecutions for corruption in PNG are rare (Kabuni and Walton, 2025).

Respondents also raised concerns about the inadequacies of some reforms, with the Whistleblower Act (2020) coming under particular scrutiny. One Papua New Guinean government official said that this legislation was inadequate as it had no mechanisms in place to support whistleblowers, and that there were moves afoot to amend the act. One respondent agreed, and said that the Whistleblower Act (2020) provides just one example of legislation that has been rushed to fit with artificial deadlines from politicians keen to be seen to be passing anti-corruption legislation:

I found out that the legislation was copy-pasted from the Jamaican Whistleblower...Act. They removed some of the parts, and inserted others... and this is basically the explanation why the act is how it is.... They were pressured by the politics at that time that this needs to be endorsed. And they told me later that one official was tasked to do it over night. And he did it.

This respondent also said that the unexplained wealth provision in the Proceeds of Crime Act was similarly rushed and based on Queensland legislation, which led to significant inadequacies around asset declaration.

A sizable minority of respondents were also wary about the ability for the PNG ICAC to live up to growing public expectations. Indeed, some were concerned that it had been set up to fail. For example, one Papua New Guinean respondent thought that the appointment of foreign commissioners on three-year terms was a deliberate ploy to ensure that by the time the commissioners had worked out who was corrupt and how the law and justice system worked, it would be time for them to leave the country<sup>11</sup>. They said this threat was

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<sup>11</sup> Note that his research was conducted before the three foreign appointed commissioners were suspended.

exacerbated because the ICAC had not been adequately seeking out local advice: “The way I see it, they [the ICAC] are just running it as if they were in Australia”. Another respondent agreed, and said to overcome this challenge, the agency had to show there were pathways so “nationals can take over.” Others were concerned about the ability of the Commissioners to withstand the pressure that comes with the job: one external advisor for example wondered what would happen when the Commissioners had to deal with death threats that can emerge from investigations into corruption in PNG.

In response to such claims, a respondent with working knowledge of the ICAC argued that the reality is “[q]uite the contrary, but this is not externally visible” and noted various ways that the agency has engaged with other integrity agencies and government departments, including through training workshops and committees. This respondent also argued that it should not be surprising that the agency was run “as they were in Australia” given that the Organic Law underpinning the ICAC is based on the United Nations Convention Against Corruption, and:

Article 65 of UNCAC requires State Parties, such as PNG, to implement the various obligations under the Convention. The Organic Law was drafted taking in account a few international models such as Hong Kong...and New South Wales and the consideration of other approaches.

In other words, the PNG ICAC should be evaluated in relation to other similar agencies around the world rather than a PNG-focused agency per se. Finally, in response to concerns about the perceived pathways for nationals to take over, this respondent acknowledged that it is true that “the government has expressed a desire for there to be a significant presence of internationals among the senior ranks of ICAC for many years to come”. Yet, they went on to argue that:

ICAC is currently staffed by about 10% expat professionals, generally in areas where the skills and experience are not readily available in PNG (e.g. forensic accounting, digital forensics and data analysis). Those expats are not just from Australia. As ICAC grows over the next 1-2 years, that proportion is expected to decrease in percentage terms. (By comparison, I understand when ICAC Hong Kong commenced in the 1970’s it was predominately made up of expat staff). There has been, and will continue to be, major investment in training national staff.

However, recent events have changed this dynamic, with the suspension of foreign Commissioners and with other foreign staff leaving changing the composition of the organisation. This suggests that any future appointments should take into account the mix of foreign and national staff.

The same respondent also noted that the agency has faced other hurdles, particularly around funding, saying that: “ICAC received only 68% of its 2024 budget...and at times faced cash flow issues resulting in the delaying of projects and some recruitment”. They also noted that promises of significant other “additional funding” budgeted in February 2022 through the Prime Minister and Minister for Administrative Affairs was not forthcoming. As of mid-2025, ICAC had made one arrest and had yet to prosecute a single corruption case. Confidence in the agency was further undermined when infighting among the foreign-

appointed commissioners led to the suspension of all three and their replacement by nationally appointed acting commissioners (Faa, 2025).

#### **4.2.2 Building political will for anti-corruption reform**

The previous analysis suggests that while many have been optimistic about recent anti-corruption efforts, there are still significant challenges around the design of new and promised reforms and their implementation. In turn, this subsection examines respondents' views on how to build political will to ensure more meaningful anti-corruption reform. The role of different institutions in bringing about these changes is outlined below.

##### **Politicians**

When asked about what it might take to improve anti-corruption reforms in PNG, most respondents focused on the role of the country's national politicians. To build political will amongst this group, respondents suggested two broad strategies. First, they focused on engaging existing politicians. For example, one Papua New Guinean working for a state integrity agency reflected on their experiences with working with politicians to develop anti-corruption policies:

From that experience, I see that building that political will is really critical [to help deliver anti-corruption reform], not just with the government of the day, but also with the opposition, because they have their priorities, and understand the context ...and [can] manoeuvre around the politics. Because if you have no idea, you might be blindly going into something that might trigger them off to not support you. And that's what we learnt. So, it's not just about what we read in the papers, but we also have to be mindful of what people say about this particular leader and what is going on in his own life.

In other words, effectively working with political leaders requires understanding the incentives driving their decisions, along with patience and a genuine commitment to long-term engagement.

Others stressed that building political will means engaging with the "right kind" of leaders. That is, it demands identifying and working with "cleaner" politicians committed to reform. For example, several respondents working for integrity institutions said that their ability to advance reforms, including legislation and policy, has been mostly if not solely dependent on the commitment of a few individual politicians. A Papua New Guinean from a local integrity agency summed up this situation, noting that when a previous Treasurer was in power significant legislation that supported their agency passed through the parliament, whereas other political leaders in the same position were less supportive. He said anti-corruption reform, "[d]epends on individual ministers; they need to run with it."

A respondent from a donor organisation, however, said that all too often anti-corruption champions in PNG have been sidelined. He pointed to the case of ex-MP and outspoken anti-corruption advocate, Bryan Kramer. Kramer was dismissed from office in May 2023 after The Leadership Tribunal found him guilty of misconduct in office, though he was later reinstated. This respondent noted he was possibly dismissed for putting the wrong person off-side, and as a result, he lamented, "there goes your anti-corruption champion".

The second strategy respondents said was needed for building political involved investing in electoral reforms. For example, one respondent with a long-term engagement with anti-corruption efforts across the country said given his experience,

I'm convinced that despite [recent reforms], although sincere in their intentions, [they are not] ...going to work in a country that's so politicised... we have a broken electoral system. The only way to bail this country out and mitigate corruption, at least the big [corruption], is to make sure that you have good leaders getting in.

In turn, respondents argued for various electoral reforms, including further support for the electoral commission, lengthening parliamentary terms, increasing security and oversight during elections, introducing biometric voter registration, and supporting integrity and enforcement agencies to bring charges against and prosecute those involved in electoral corruption.

Having said this, some cautioned that while getting the “right” leaders was important it would be neither easy, nor a magic bullet. Indeed, one respondent said electing “good leaders doesn't mean the country will run well”. This reflects previous research has shown how compromised PNG's elections are, despite decades of electoral reforms (Transparency International PNG, 2022). However, for many, supporting electoral reform is an important step towards building political will, and in the words of a long-time anti-corruption advocate, could “give society a sense of security in terms of governance”.

## **Donors**

As highlighted in the previous section, respondents noted the significant contributions donor countries and multi-lateral institutions have made towards improving governance in PNG. Some wanted donors to scale up training and technical support. This included training on investigations and navigating IT systems that have become increasingly central to anti-corruption efforts. A senior government official said, “we have a lot of needs, especially capacity wise; [we need] training upskilling, maybe academic courses”. This official went on to say,

Maybe [we could have] more training programs [on] free freedom of information; [for example this could focus on] how to draft the technical aspects of freedom of information. I'm lost when it comes to this. There are three labels that they use: freedom to information act, rights to information act, and the access to information act. Are these three the same or are they technically different?

Given that the government is developing a right to information act, and the shortcomings of the hastily drafted Whistleblower Act (2020), such suggestions are to be welcomed. Yet, some were also sceptical about donor-supported training. One respondent who worked for a donor noted that, “[t]here's limited absorption capacity within the groups that we train and mentor...[and] seemingly no thought given to that when we design projects.” In turn, he suggested that before rolling out training, donors should step back and think more critically about “where we can influence and make a difference”. Others raised concerns about the suitability of one-off or short-term training courses and workshops that fail to support participants once they return to their offices.

Many respondents were also keen to see donors follow the EU and IMF's lead in applying greater pressure on the PNG government to implement and expand upon recent anti-corruption reforms. For example, one civil society advocate said,



when [donors] see misapplication of funds ...they should not continue to give the funds to PNG. They should restrict the funds so that leaders ... realize that no one from outside will help if PNG continue to misapply the funds that are given.... [T]hat will also strengthen the internal revenue generation and management.

This is not to say that donors were not applying pressure behind closed doors. One respondent said he'd seen first-hand how donor representatives had robust conversations with their Papua New Guinean counterparts over concerns about corruption. However, some respondents wanted donors to take an even more public and tougher stance.

Finally, respondents called for donors to "walk the talk" and show that they were as committed to anti-corruption reform as their rhetoric and policies suggest. One respondent argued that Australia needed to, like PNG, implement the EITI, rather than simply supporting the EITI process and contributing to PNG's efforts to uphold this global standard:

In terms of implementing EITI in Australia, a lot of Australian companies are operating here in PNG, [so] it gives us confidence and credibility [if] Australia signs up.

While some acknowledged that Australia had improved cooperation and information sharing with key PNG integrity agencies, particularly FASU, others wanted Australia to do more. A senior representative from one of PNG's integrity agencies said,

[Australia] keep[s] all of the information about our corrupt politicians and financial transactions. This information has to be shared...because we know that there ...are a lot of authorities or leaders who are buying houses and cars, you know, in Australia... But information has not been given to us.

Reflecting this sentiment, another respondent said, "the AFP and AUSTRAC could do vastly more than they're currently doing [to address money laundering and transnational corruption in the region]. But, [t]hey've never been given an Australian government mandate to actually do anything that looks offshore". A key reason why countries of the global North don't do more is because, according to this respondent, donors lack political will:

[Australia] hasn't had the stomach for it. And I don't think the US has had the stomach for it, either. They want to be able to invite the Prime Minister of the day to come to the White House or to the lodge and not have that uncomfortable conversation of "sorry, we've just [confiscated] all your property in Australia because we can't work out how you could ever possibly have acquired that wealth legitimately."

So, while many supported donor efforts to support anti-corruption efforts, some were concerned that donors could do more, both within PNG and within their own countries.

## **Civil Society**

While PNG's civil society is relatively small and, as one external advisor noted, "fragmented", some elements have played a crucial role in raising awareness about and shaping anti-

corruption reform. Many respondents believed that civil society was more important than ever to help ensure that recent reforms took root and survived what many considered as the inevitable political backlash arising from investigations and prosecutions of corrupt leaders. One senior representative from one of the country's integrity agencies said that the ICAC needed to ensure support from civil society to ensure there's "enough of a groundswell so that if government starts defending or cancelling out [anti-corruption efforts], that there's enough support for us to fight back".

Respondents pointed to three important ways to bolster civil society's ability to advocate for meaningful anti-corruption reform. First, some wanted to see reliable funding for the sector. One respondent who had first-hand and long-running experience with civil society organisations across the country, said,

chances of government support for civil society are quite low... So, [donor] support for civil society organisations in this country is one area that can be looked at to try and generate the kind of pressure that's needed to get politicians to do things.

Second, respondents noted the importance of better engaging the churches in the fight against corruption. While acknowledging the history of the Catholic and other churches in advocating on corruption issues over the years, one church insider argued that:

the churches, such as the Catholic Church, have the moral authority to speak but the church [is] not doing that. [As a professional, I] can speak out, but we need the bishops to really stand up. If the bishops can collectively speak out it would be great.

This respondent also noted the difficulties around talking out about corruption given the government funds the church's programs. In other words, talking out too loudly about government corruption might be interpreted as biting the hand that feeds you.

Finally, respondents argued that more needed to be done to support civic movements in rural and remote areas. Beyond Port Moresby's bright lights and roundabouts and Lae's verdant streets, civil society's influence is weak. One donor representative noted that, currently, if there is going to be a civil society movement against corruption it's "gonna be in Lae and Moresby". However, some respondents were keen to point out examples of successful civic action beyond the nation's urban areas. A civil society representative reflected on his experience of rural communities banding together to resist logging and deep-sea mining projects that have been supported by, allegedly, corrupt state agencies and politicians. He noted how such struggles are occasionally supported by urban-based NGOs and others through legal and other forms of assistance.

### **Integrity agencies**

When asked what integrity agencies could do to support political will towards anti-corruption efforts, most respondents focused on one issue: cooperation. With the Ombudsman Commission challenging the Organic Law on the ICAC in the Supreme Court (a case that was ultimately thrown out) some respondents claimed there was lingering animosity between these two agencies. Having said this, it is important to note that one respondent with first-hand knowledge of the ICAC noted that the organisation was open to advance cooperation between the agencies and were working on establishing an MoU with the Ombudsman Commission to solidify cooperation. Despite such overtures for reconciliation, some

respondents said that relations – at the senior levels of these organisations at least – remained strained.

Respondents also noted that distrust between agencies was far reaching, with suggestions most of the country's integrity agencies are operating in "silos". One donor representative said "... everybody's working in isolation. [The] Ombudsman, the public prosecutor, the police, no one knows what the other is doing". This means that some agencies are discovering potential corruption but are reticent to share this information with their counterparts, such as the police, which in turn undermines possibilities for securing successful prosecutions. Another respondent said that while efforts to coordinate are improving – particularly around AML – though agreed that agencies are too isolated from one another.

This situation has resulted in frustration within those working within integrity agencies. One Papua New Guinean with significant experience with the country's integrity agencies said,

we cannot continue to work in isolation. Anti -corruption agencies like the police, the Ombudsman Commission, the public prosecutor and the Auditor General, plus others...have to work together so that we can share resources, we can share expertise, we can use whatever is available at our disposal to assist each other in the fight against corruption

This is not to say there are not efforts to bridge institutional divides. Respondents noted that there were ongoing attempts to strengthen connections between integrity institutions, including through formal (such as committees, conferences, multi-stakeholder groups, policy design) and informal fora. However, all too often these efforts have failed to replicate the interagency success of previous anti-corruption efforts. The National Anti-Corruption Alliance and Investigations Taskforce Sweep were commonly cited examples of successful past inter-agency cooperation.

Respondents argued that improving on the current situation required learning from these examples to foster political buy in and greater willingness from agency heads to co-operate. One respondent who had successfully brought together representatives from integrity agencies, senior bureaucrats and political leaders to cooperate on anti-corruption efforts in the past, argued that bridging institutional divides is possible, but required buy in from the all levels of government – especially from senior politicians and the national executive council in particular – and ongoing efforts to ensure these efforts trickle down to "each of us [working in integrity agencies]".

## **Government**

Respondents also said that the PNG government had an important role to play to support anti-corruption efforts; however, most considered key national departments and subnational governments either far too politically compromised or lacking in enough capacity to adequately assist. In turn, respondents called for reforms which they thought would strengthen the government's ability to better support and implement anti-corruption policies.

Some called for a cultural shift within national government departments to ensure, in the words of one external advisor, "a very strong effective administrative system". One Papua New Guinean respondent who worked for a national integrity agency said that the ability for the government to support anti-corruption reforms,

comes back to those three very important institutions that need to be re-cultured: national planning, treasury and finance. Because they are heavily politicized, the

systems and processes are compromised to a point where you never know who you're talking to, and what their association is.

Still, the above quote highlights the importance of understanding the complex webs of relationships between public servants and politicians when developing anti-corruption reforms and potentially shifting some norms. Although doing so will not be easy given the hitherto limited gains from past public sector reform in PNG.

Other respondents argued that for further subnational reforms are required given the significant resources now being channelled to provincial and district administrations. This included strengthening oversight mechanisms in DDAs. One respondent working for a national government department said,

there should be additional powers given to...the [district] administrators. Somewhat similar to what was happening in the past: District Commissioners were really powerful down in the sub-national level. You should at least give extra powers to the administrators in the provinces, ... where there's some sort of reporting and accountability mechanism to be able to influence the behaviour of agencies that are supposed to deliver services to the people on the ground.

He went on to argue that extra powers should only be granted to districts that have the capacity to absorb them.

### **Thinking beyond political will**

While, overall, respondents were mostly optimistic for the potential for greater efforts from donors, civil society and the private sector to influence change, a few had all but given up and were looking for more innovative and less politically fraught solutions. For example, some pointed to the sometimes-unsung work of FASU in quietly working with financial institutions to help them curb the activities of politically exposed persons. They suggested expanding on this approach by investing in better technology to enable monitoring of international transactions and, when relevant, shutting down suspicious accounts. This would by-pass the judiciary and police, two institutions which are significantly underfunded and can be prone to corruption (the police) or terribly slow and inefficient (the judiciary). It also means that reformers do not have to rely on building up state and non-state institutions, many of which are already significantly stretched and politically compromised. Those who were seeking a way around the political challenges of dealing with corruption in PNG are still few in number; however, they do point to the significant difficulties faced by those seeking to build political will for anti-corruption reform in PNG, and the importance of finding solutions that bypass the complexities of the countries weak and politically compromised institutions.

#### **4.2.3 Are Papua New Guinean responses possible?**

Previous research has shown that many Papua New Guineans consider the *wantok* system – a system of reciprocity within kinship groups – as a key driver of corruption (Transparency International PNG, 2022). However, others have shown that that Papua New Guinean citizens resist what they might label as corrupt behaviour (such as stealing from schools), even when they might embrace what others deem corruption (such as electoral candidates bribing constituents in exchange for their vote) (Walton, 2013b and 2018). In turn, respondents were asked what they thought of the potential for a uniquely Papua New

Guinean response to corruption. And if such a response might complement other anti-corruption efforts.

Most respondents emphatically said no: they didn't think that there was a uniquely Papua New Guinean response to corruption. As one civil society activist said,

I am using the anticorruption lens to look at the *wantok* system, so I look at how it disrupts the formal system. I can't see what the [Papua New Guinean] accountability systems would be, unless you talk about cultural practices like bride price [the transparent exchange of goods and money during marriage ceremonies], but I can't see how that is an accountability process. Transparency processes are a part of communities (like bride price; there is no offshore accounts), but I wouldn't say there are accountable systems. You don't engage in bride price ceremony with offshore companies.

Others reiterated this concern, noting that even if traditional leaders were to advocate against corruption few would listen as their authority had been severely undermined and influenced by the cash economy. As another local civil society representative said,

Those who have the money or resources tend to make decisions, so that means the village elders or chiefs, they can stand up against corruption, but the population at large may be bought, or given some kind of inducement, and then they will throw the elders out.

When asked if the *wantok* system might help with investigating or uncovering corruption, respondents were also unconvinced, with one Papua New Guinean working for an integrity agency pithily saying: "I think to get things done, you need a connection. But when it comes to punitive measures, you need to break up". In other words, most respondents did not believe that traditional values or practices were an answer to corruption in the country.

However, there were two exceptions which point to the potential for PNG approaches to help assist anti-corruption efforts. First, some Papua New Guinean respondents said that under some circumstances cultural practices might assist anti-corruption efforts. One Papua New Guinean respondent with experience of engaging communities around issues of anti-corruption and governance initiatives said:

I always tell people, when it comes to a lot of traditional wealth distribution or resource distribution, it's all public. No one holds a bride price payment in secret. It's all very public. And that's a very big difference between the modern system and traditional systems. Traditional systems are very transparent. It [a bride price ceremony] is a public event... I think ceremonies are something that we need to rebuild and revive [to aid transparency], some sort of modern ceremonies, like customary ceremonies, are important.

This respondent went on to suggest that presenting DSIP cheques openly in a format akin to a bride price ceremony could be one way of better making modern administration efforts meaningful for Papua New Guinean communities. Another respondent suggested that the *wantok* system could be better drawn on to communicate about the impacts associated with corruption on local communities and the importance of resisting it. This reflects Peiffer and

Walton's (2022) research finding that Papua New Guineans are more likely to report corruption if they are shown messages that highlight how it impacts on their community.

Second, others noted that intermarriage – that is marriage between different ethnic groups – was a potentially powerful and unheralded mechanism for aiding anti-corruption efforts. One respondent from an integrity agency said that they were able to develop support for anti-corruption reforms in different regions of the country by drawing on their paternal and maternal genealogy. Describing how she gained political support for key anti-corruption legislation she said:

If you are a quarter-cast from different parts of the country, then it's easier. For instance, one of your parents is from East New Britain, another is from the Highlands etc, then it's easier. But if you are from one part of the country, ... it's really hard to use your *wantoks* because you will be dealing with maybe four members of parliament but [when you are of mixed ethnicity] you are looking at 100 plus.

She went on to say that to be successful, anti-corruption reform efforts needed to “[build] a coalition of like-minded Papua New Guineans from various ethnic groups, not only one ethnic group, because you would still be faced with the different ethnic groups at play [in engaging in corruption]”. For another respondent, building a sense of nationalism through intermarriage could help to mitigate the types of patronage politics so often associated with corruption in the country.

It is also important to note that some respondents noted that the potential for Papua New Guineans to engage in discussions about corruption is also determined by gender. Indeed, female respondents were particularly concerned about their ability to advocate against corruption in the wider community, with one female respondent saying:

In PNG, we have this system where it's very difficult as a woman [to speak about corruption]... I'm from a patrilineal society, and my husband is very supportive. But when it comes to making decisions in a community, I don't have as much say, [compared to] when I'm in my professional place, [where] everybody knows I'm in charge. But going back home, I have to wear a different hat. It's just so difficult.

This is a stark reminder of the difficulties women face in engaging in discussions about integrity across the country.

## 5. Discussion and recommendations

Recent reforms enacted by the PNG government suggests there is a high level of political support for anti-corruption reforms. However, findings from this report have shown that while there is optimism among respondents, lurking behind the government's recent reforms and plans many are questioning their relevance and potential. There are serious questions about the ability of the country's existing and new integrity agencies to investigate and prosecute corruption. Previous analysis in this report suggests that, despite numerous laws and integrity agencies, politicians are less likely to face consequences for corruption now than in the past. This suggests that there are elements of the anti-corruption agenda in PNG that are more performative than substantial. Still, within this context there is room for manoeuvre, and sufficient indications that action against corruption can – albeit rarely – produce significant results. Drawing on the report's findings this section outlines nine key policy recommendations. These recommendations are suggestions, rather than directives. Policy makers are themselves in the best position to determine which recommendations they can support.

The first key recommendation is that policy makers need to do all that they can to **ensure the PNG ICAC is functioning to the best of its ability and mandate**. PNG's ICAC now shoulders the expectations of millions of Papua New Guineans – citizens, the government, civil society as well as anti-corruption reformers – that it can and will do something about corruption. Interviews with key stakeholders featured in this report suggest that while some expressed concern about a lack of progress, at the time of fieldwork the ICAC enjoyed significant backing from anti-corruption campaigners. However, public and practitioner confidence has taken a hit given the recent infighting and suspension of the three foreign commissioners. It is easy to see that goodwill towards the ICAC will continue to wane unless the agency is seen to be effective, and managing its own affairs transparently and with greater accountability. If this doesn't happen, it is likely that many will lose faith in both the ICAC as an institution and the government's broader anti-corruption reforms.

Given this, policy makers need to prioritise their support for the ICAC. This will require significant efforts to break down the barriers that have formed between the ICAC and other agencies. While the ICAC and other agencies are making some progress towards this goal, more needs to be done. This could mean supporting some of the many of PNG's statesmen and women who have deep relationships with people in different integrity agencies. These anti-corruption champions could help to build bridges between institutions (through for example organising formal and informal meetings and discussions). The recent suspension of ICAC's three commissioners also points to the importance of establishing robust internal governance frameworks - including clear operational guidelines, transparent reporting mechanisms, and safeguards against conflicts of interest – along with measures to ensure proper oversight of this increasingly important institution. This could require reviewing the hiring processes for incoming commissioners and establishing clearer internal rules and regulations around the powers of commissioners and others within the ICAC.

This is not to say that other agencies do not require support. As this report has noted there has been a long-standing under resourcing of key integrity agencies, such as the Ombudsman Commission, Auditor General and Attorney General's office. These agencies

need greater backing through technical assistance and funding. Moreover, all of these agencies, as well as the ICAC, need greater support from the public; particularly at times when funding is threatened or they are underpaid. This could involve a more targeted campaign that seeks to inform the public about the budgetary decisions that politicians are making about these agencies. Having said this, given the symbolic and administrative importance of the ICAC to anti-corruption reforms, it is this agency that needs to be a priority.

The second recommendation involves **working to improve and introduce relevant anti-corruption legislation**. While much has been done in this space, more is needed. For example, there are flaws in some reforms; the Whistleblower Act (2020), which will need to be re-written and amended, is the most noticeable of these. Freedom of Information legislation is also needed. While working and re-working legislation is critical, it is also important to note that legislation by itself is no magic bullet. PNG has many laws. Often times, too few of them are followed. In turn, while improving and introducing laws is an important recommendation, it should not come at the expense of making sure existing legislation – no matter how imperfect – is actually implemented. In PNG, investigations, arrests, funding, support for whistle-blowers and prosecutions are more important than tightly worded legal instruments.

The third recommendation focuses on **subnational reforms**. Over the past 10 years, Papua New Guinea has gone through significant decentralisation reform. While Provincial governments have also benefitted, it has been district governments – through the creation of DDAs and the increase of DSIP funding – that have grown most substantially. The rise of district governments has been accompanied by concerns about oversight, particularly around the spending of DSIP funds, which are often used by politicians to deepen and widen patronage networks. This means more attention needs to be paid to strengthening district administration and oversight. This could be done by strengthening existing institutions – such as the Department of Finance. Oversight could also be strengthened by engaging with other sectors, such as the Water Health and Sanitation (WaSH) sector which has introduced district WaSH committees to advocate for better spending in this area.

This situation also calls for some reflection about the changing nature of corruption in PNG. Because politicians are increasingly engaging in patronage politics, which has been strengthened through increases to DSIP/PSIP funds, many people in the country are caught up in a collective action problem that incentivizes the continuation of corruption. This results in a tightening of the gap between “need” and “greed” corruption, and disincentivises people from reporting corruption. This means that the fight against corruption needs to be done in a way that replaces the benefits that accrue to citizens, while punishing those who engage in “greed corruption”. This means that “zero tolerance” approaches are unlikely to work in PNG. Given the weakness of the state, there will be informal ways of redistributing state resources to the marginalised for many years to come. The tightening between greed and need corruption suggests care needs to be taken that reforms target those engaging in the former and make up for any loss to those who benefit from the latter.

The fourth recommendation centres around **supporting civil society**. Civil society in PNG might be relatively fragmented, but it continues to play an important role in championing anti-corruption efforts. It is important that larger NGOs such as Transparency International are



supported through dependable and regular funding. It is also important that smaller scale grassroots organisations along with church organisations are also supported. The former can often respond to the politics around corruption in PNG in ways that larger organisations cannot (Walton, 2018). The churches are critical in any conversation about addressing corruption given they are well-respected and have played a role in speaking out about corruption and poor governance. However, some churches have not been as vocal about government corruption as they could be, in part due to their reliance on government revenue to deliver services. Working with church groups to work towards a united front on corruption could help to overcome these challenges, so that any perceived criticism from anti-corruption advocacy is not seen to be coming from one or a few denominations, but a larger united group.

The fifth recommendation focuses on what western donors can do in their own countries and organisations. While lauding some donor efforts, some respondents suggested that developing meaningful political will require **Western donors to examine the ways in which they can perpetuate PNG's corruption** (through money laundering, for example). It is important that donor countries are not only supporting PNG's anti-corruption efforts within the country but are also examining ways of tightening up their own domestic money laundering and transnational bribery legislation and improving co-operation with PNG's integrity agencies.

The geopolitical tensions over PNG led some respondents to suggest that Western donors could find it difficult to prioritise governance reform over maintaining relationships with political elites who will push back against China. These pressures are likely to increase, which could mean that those working within Western donors need to be ready to resist against moves to weaken anti-corruption reforms and diplomacy.

The sixth recommendation is about **identifying political champions and supporting longer-term reforms**. Politicians play an important role in supporting both the ICAC and broader anti-corruption reforms. As respondents have noted, they can help with the implementation of anti-corruption reforms through approving legislation, increasing funding and resourcing and implementing inquiries. However, it is important to note that politicians play a dual role: they are both tangled in webs of corruption and potential champions of reform. In turn, knowing how and who to engage with requires an understanding of the country's political economy, and mapping out who is connected to whom. Such mapping exercises can identify anti-corruption champions, and those who might resist reform. It can also highlight the networks that might come to the fore when integrity agencies investigate and attempt to prosecute. This requires further research.

It also demands long-term commitment and relationship building, which is not suited to the kind of short-termism of many development actors. It also means accepting that politicians who play the role of anti-corruption champions might not be around long enough to effect significant change. While there is certainly a case for supporting electoral reform, this is a longer-term proposition. Right now, reform minded policy makers will have to deal with the people already in positions of power. But they should also keep in mind that electoral reform will continue to be an important part of any efforts to improve governance (as elections are often times of heightened corruption) and help to reshape opportunities for further reform.

The seventh recommendation relates to **exploring the potential for supporting unique Papua New Guinean responses**. Respondents noted that there is a place for Papua New Guinean approaches to anti-corruption. Some believed that this might involve mimicking local cultural practices, many others said it would more likely emerge out of the multi-ethnic nature of modern-day PNG. As more Papua New Guineans intermarry, it has been argued, there is a greater potential for those individuals to speak out against corruption to a variety of communities and their leaders. Understanding the potential for such approaches to anti-corruption reform requires more research. Such research should also focus on the challenges that female reformers in particular face in advocating against corruption, and how these might be overcome.

The eighth recommendation focuses on developing **targeted awareness raising and advocacy efforts**. Previous research has shown that Papua New Guinean citizens will most likely respond to anti-corruption messages that highlight the impacts that corruption has on their own communities (Peiffer and Walton, 2022). This means that to encourage citizen engagement with anti-corruption efforts government and donors should emphasise the impact that corruption has on *wantoks*, friends and family. Furthermore, research (Walton and Peiffer, 2017) has also highlighted the importance of formal education in improving citizens' support for anti-corruption efforts, which suggests that improving formal education outcomes (through for example improving teacher-student ratios while getting more children into school; as well as more targeted measures such as TI's School-Based Civic Education Project) should also be a part of the solution. This approach is in line with PNG's National Anti-Corruption Plan of Action, which calls for incorporating "important anti-corruption learning themes and components into the formal education curriculum of the country, beginning with primary education learning through to the higher secondary level and tertiary levels" (Government of Papua New Guinea n.d: 26).

The final recommendation centres around training. Respondents called for training in a variety of areas, including in drafting legislation and investigating corruption. These are areas where donors often have capacity and expertise to respond. However, respondents cautioned that **training needs to be focused on supporting participants' learning over a long period of time than is usually the case**. Short-term training can fail to make a meaningful contribution to anti-corruption efforts.

## 6. Conclusion

This report has featured an analysis of literature, policy and budgetary documents and interviews with 27 anti-corruption reformers. It has shown that while there has been significant anti-corruption reform undertaken by the Marape-led government since 2019, questions remain about how effective this will be. Analysis featured in this report demonstrated that while there is some optimism – particularly in regard to the ICAC – many are concerned that anti-corruption reforms will fail to effect meaningful change. While acknowledging that engaging in anti-corruption reforms is challenging and uncertain, this report has outlined how policy makers and others might overcome these challenges. These suggestions are in no way meant to be a magic bullet. But they are designed to provide policy makers and others with an understanding of the key opportunities and threats associated with advancing anti-corruption reform in the country, and how these might be addressed.

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## 8. Appendices

### Appendix 1: Semi-structured questionnaire guide

#### ANU/UNODC: Rapid political economy analysis of Anti-Corruption Efforts in PNG

##### *PNG Research Instrument*

My name is Grant Walton and I am an Associate Professor at the Crawford School of Public Policy at the Australian National University (ANU) in Canberra, Australia.

*We will start with some basic questions about yourself.*

1. Tell me about yourself and your work
  - a. Education
  - b. Position
  - c. Work history
  - d. How long in current role
2. What are the **causes of corruption in PNG**?
  - a. What are the key drivers of corruption **within Papua New Guinea**? (culture [wantok system], politics, etc)
  - b. What are the key drivers of PNG's corruption that come from **outside of the country**?
3. Corruption is often assumed to be contained within the borders of the nation-state. To what extent is that true in PNG?
  - a. **Can you give me examples of corruption that moves between jurisdictions?**
  - b. If you had to choose, what would of these statements do you think most true: 'corruption is PNG's own fault'; 'corruption is caused by foreigners'
4. Where do you think corruption is most prevalent in Papua New Guinea? (For example, which sectors (private, civil society or public), government departments, or industries are most associated with corruption?
  - a. How do you know?
5. Over the past ten years there have been numerous reforms to address corruption in the country (e.g. introduction of ICAC, whistle-blower legislation, public inquiries, etc) how effective do you think **efforts to address corruption** in PNG have been?
  - a. Are these just **symbolic**?
  - b. How could these efforts be improved?
6. Some people think that PNG's anti-corruption efforts do not have sufficient 'political will' to succeed.
  - a. **How would you define political will?**
  - b. What would effective political will towards anti-corruption reform look like?
  - c. How likely is it to come about?
7. **[If building political will is a good idea]:** How do you think 'political will' towards meaningful anti-corruption reform could be built in PNG?
  - a. What role do you think civil society should play?
  - b. What role do you think donors should play?
  - c. What role for the private sector?
  - d. What about public officials and politicians?
  - e. What role for nation building?
8. **[If building political will is not a good idea]:** What do we need to do to fight corruption that does not involve building political will?

9. Do you think there could be a **uniquely PNG/Pacific response to corruption**? Why/Why not?
  - a. And if so, what might that look like?
  - b. What role does culture/wantok system play in addressing corruption?
    - i. Could it play more of a role? If so, how?
  - c. What role do narratives about sovereignty and nationalism play in debates about corruption and anti-corruption? Could it play more of a role? If so, how?
    - i. Could it play more of a role? If so, how?
10. At what scale do we need to focus most on when it comes to combatting corruption associated with PNG: the local/village level; district/provinces; national; regional or international? Why?
11. Tell me about the future of anti-corruption reform in PNG? What do you think will happen over the **next five years**?
12. *I want you to think back to previous anti-corruption reforms you are familiar with in PNG. For example, there have been a number of government reforms focused on addressing corruption in PNG – this includes the introduction of an ICAC, the opening of an Ombudsman Office in Enga Province, the passing of a whistleblower protection act, along with the inquiry into the UBS deal. Of an anti-corruption reform you are most familiar with, can you please tell me:*
  - a. *How did it come about?*
  - b. *How successful do you think it was?*
13. Who else do you think I should speak to about this research?